

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Scott Powers, individually, as Representative of the  
Estate of Erika Zak, and as the natural guardian of  
L.P., a minor,

Plaintiff,

vs.

Constantinos Sofocleous and Memorial Sloan  
Kettering Cancer Center,

Defendants.

Case No.:  
1:20-cv-02625 (LGS)

**PROPOSED JOINT FINAL PRETRIAL ORDER**

In accordance with §IV(B)(2) of Your Honor’s Individual Rules, the parties respectfully submit the following Proposed Joint Final Pretrial Order in the above matter:

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**(a) Full caption of the action**

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**(b) Trial counsel**

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**(c) Basis for subject matter jurisdiction**

Plaintiff Scott Powers is a resident of Oregon. Defendant Constantinos Sofocleous is a resident of New York and is licensed to practice medicine in New York. Defendant Memorial Sloan Kettering Cancer Center is a New York corporation with its principal place of business in New York.

This Court has diversity subject matter jurisdiction over this lawsuit under 28 U.S.C. § 1332(a)(1) because Plaintiff is a citizen of Oregon, Defendants are citizens of New York, and the amount in controversy exceeds \$75,000.

**(d) (1) A brief summary of the claims and defenses that remain to be tried**

**Plaintiff's Summary of Claims:**

**A. Medical Malpractice**

1. Dr. Constantinos Sofocleous committed medical malpractice by failing to use his best judgment when he proceeded with the ablation procedure.
2. Dr. Constantinos Sofocleous committed medical malpractice by failing to use ordinary and reasonable care, diligence, or skill in the performance of the ablation.

**B. Lack of Informed Consent**

1. Dr. Constantinos Sofocleous failed to obtain Erika Zak's informed consent before proceeding with the ablation procedure on April 10, 2017. *See* N.Y. Pub. Health Law § 2805-d.

**C. Wrongful Death**

1. The wrongful acts of Defendants caused Erika Zak's death, and therefore her distributees suffered pecuniary loss.

**D. Plaintiff's Derivative Action**

1. Plaintiff suffered the loss of support and society, and economic loss as the result of the injuries Defendants caused Erika Zak.

**Defendants' Summary of Claims and Defenses:**

- A. Medical Malpractice: Dr. Sofocleous departed from the standard of care in his performance of the ablation on April 10, 2017.
  - a. Defense: Dr. Sofocleous' performance of the ablation was in accordance with the standards of care.
- B. Lack of Informed Consent: Dr. Sofocleous did not obtain Ms. Zak's informed consent on March 22, 2017 for the April 10, 2017 ablation. See N.Y. PHL §2805-d.
  - a. Defenses: Dr. Sofocleous properly obtained informed consent from Ms. Zak, and even if not, Ms. Zak would have proceeded with the ablation anyway.
- C. Wrongful Death: Dr. Sofocleous' departure from the standard of care in his performance of the ablation on April 10, 2017 resulted in Ms. Zak's death.
  - a. Defense: Dr. Sofocleous' performance of the ablation was in accordance with the standards of care, and there is no causal nexus between the ablation and Ms. Zak's death.

**(d) (2) A brief summary of defenses previously asserted that are not to be tried**

Defendants agreed to withdraw the below six affirmative defenses with prejudice, and they were dismissed with prejudice. Dkt No. 201:

- A. Defendants' Second Affirmative Defense: "That the plaintiff lacks legal capacity to bring one or more of the causes of action set forth in Plaintiff's Complaint."
- B. Defendants' Third Affirmative Defense: "That the cause(s) of action herein may not be maintained because it is barred by the applicable Statute of Limitations prescribed by the CPLR and the laws of the State of New York."
- C. Defendants' Eighth Affirmative Defense: "If upon trial, it may appear that some or all of the damages claimed by plaintiff herein were brought about or contributed to by reason of plaintiff/plaintiff-decedent's own acts, actions or negligence; and if so, plaintiff's damages, if any must be diminished accordingly."
- D. Defendants' Ninth Affirmative Defense: "Plaintiff/plaintiff-decedent failed to mitigate, obviate, diminish or otherwise act to lessen or reduce the injuries, damages and disabilities as alleged in Plaintiff's Complaint."
- E. Defendants' Tenth Affirmative Defense: "That the plaintiff lacks standing to commence this action."
- F. Defendants' Eleventh Affirmative Defense: "Plaintiff's claim for lack of informed consent is barred by reason of the applicable provisions of Section 2805(d) of the Public Health Law."

**(e) Number of trial days needed with jury**

**Plaintiff:**

Plaintiff respectfully requests a jury trial. Plaintiff anticipates that his case in chief will take 6 full days of trial or 30 hours based on the Court's representation that each trial day is 5 hours. This estimate applies to Plaintiff's case in chief and does not include time utilized by Defendants.

**Defendant:**

Defendants anticipate their case taking 5-7 days depending on what information Plaintiff brings out and whether covered in Defendants' cross-examination.

**(f) Whether all parties have consented to trial by a magistrate judge**

The parties have not consented to trial by a magistrate judge.

**(g) A list of trial witnesses each party genuinely intends to call in its case in chief, and a separate list "identifying those whom the party may call if the need arises" (Fed. R. Civ. P. 26(a)(3)), including a short description and estimate of the length of each witness's testimony;**

**Plaintiff's List of Trial Witnesses:**

Witnesses Plaintiff expects to call in his case in chief:

1. Dr. Constantinos Sofocleous (by prior deposition testimony offered in this case as the party opponent)

Dr. Sofocleous will testify to his training, background, and experience as an interventional radiologist and interventional oncologist; his peer-reviewed publications, speaking presentations, and other recorded statements regarding interventional radiology, including procedures performed; and his treatment of Erika Zak in this case.

Dr. Sofocleous's testimony is expected to last 1 to 2 hours in Plaintiff's case in chief, not including time for Defendants' counter-designations.

2. Dr. Nancy Kemeny (by prior deposition testimony offered in this case as an employee representative of party opponent Memorial Sloan Kettering)

Dr. Kemeny will testify to her training, background, and experience as an oncologist; practice treating patients with cancer in the liver; and her treatment of Erika Zak.

Dr. Kemeny's testimony is expected to last 1 to 2 hours in Plaintiff's case in chief, not including time for Defendants' counter-designations.

3. Scott Powers

Scott Powers is the Plaintiff on behalf of the Estate of his late wife, Erika Zak; of his and Erika Zak's minor biological daughter, L.P.; and of himself. Plaintiff intends to testify to all aspects of

his life together with Erika, including the birth of their daughter, Erika's cancer diagnosis and treatment, the subject ablation procedure, and Erika's subsequent spiral into liver failure necessitating transplant. He will also testify to Erika Zak's career and talent as a textile and clothing designer and artist, the financial dynamics of their family, and the guidance Erika provided their daughter. Scott Powers is expected to testify regarding his own damages, including his expenses and loss of consortium, Erika's physical and emotional damages that he observed over time as a result of her physical deterioration and emotional and mental anguish and depression as a result of the damage inflicted by the Defendants' ablation procedure, and the effect of the harm and damages that the loss of her mother has had on his minor child L.P based on what he has observed since April 10, 2017 to the date of his testimony.

Scott Power's testimony is expected to last 1 hour in Plaintiff's case in chief, not including time for Defendants' cross.

#### 4. Kathy Zak

Plaintiff expects Kathy Zak to testify to her daughter, Erika Zak's, cancer treatment and care that she received at Memorial Sloan Kettering. Kathy Zak accompanied Erika to medical appointments and has first-hand accounts of Erika's interactions with the Memorial Sloan Kettering's physicians. Kathy Zak may also testify as to the family dynamic and Erika's condition before and after the subject ablation.

Kathy Zak's testimony is expected to take 15 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

#### 5. Chloe Metz

Chloe Metz accompanied Erika Zak to the subject procedure's consent meeting. Plaintiff expects her to testify regarding that meeting and the effect that the alation procedure had on Erika socially and physically.

Chloe Metz's testimony is expected to take 30 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

#### 6. Dr. Ronald DeMatteo

Dr. Ronald DeMatteo was Erika Zak's treating surgical oncologist at Memorial Sloan Kettering and Plaintiff intends to call him as an expert in this case as well as a treating physician. Plaintiff expects him to testify that the decision to proceed with the ablation violated the medical standard of care because it constituted such poor judgment, that a reasonable physician would have discussed and suggested several viable alternatives including the NanoKnife or radioembolization instead of microwave ablation, and the benefit that consulting other physicians, including himself, before proceeding with the ablation would have had for Erika Zak.

Plaintiff expects Dr. DeMatteo's testimony to last 3–5 hours in Plaintiff's case in chief, not including time for Defendants' cross.

7. Dr. Charles Lopez (via prior testimony given in this case)

Dr. Charles Lopez was Erika Zak's treating oncologist at Oregon Health Science University in Portland. He participated in her care during and after the time the defendants treated her. Plaintiffs intend to call him as treating physician to testify about his treatment of Erika and response to such treatment, as well as the basis for such treatment and the availability of such treatment, including immunotherapy, during the time the defendants were Erika Zak's primary cancer care treating physicians. Plaintiff also expects Dr. Lopez to testify whether any of the defendants or physicians in their employ consulted him about Erika's course of treatment and about his evaluation of Erika for the treatment he prescribed after she transferred her care to doctors at Oregon Health Science University, including Dr. Lopez.

Plaintiff expects Dr. Lopez's testimony to last 1 hour in Plaintiff's case in chief, not including time for Defendants' cross.

8. Dr. Rakesh Navuluri

Dr. Rakesh Navuluri is an expert in interventional radiology and a practicing physician at the University of Chicago. Plaintiffs expect him to testify in this case that the decision to proceed with a microwave ablation given the specific circumstances of Erika's case violated the medical standard of care and the performance of the ablation procedure violated the medical standard of care. Plaintiff expects Dr. Navuluri to also testify that the defendants should have presented a case as complex as Erika Zak's case to a multidisciplinary tumor board before deciding to proceed with a microwave ablation. Plaintiffs expect him to testify that several viable alternatives existed to microwave ablation that defendants should have discussed with Erika Zak because they would have provided effective disease control and would not have posed the risks to Erika Zak associated with thermal ablation. Plaintiff also expects Dr. Navuluri will testify that defendants should have consulted a radiation oncologist about external beam radiation as a possible treatment alternative for Erika Zak. He will also testify about why discussion of all the specific risks posed by a microwave ablation procedure with Erika including the specific risks of irreparable damage to the critical structures of her liver and the consequences of such damage was a necessary part of the informed consent process. Plaintiff also expects Dr. Navuluri to testify about medical anatomy, physiology, and the function of internal organs and associated structures, including the liver, insofar as it is relevant to Erika's case. Plaintiff also expects Dr. Navuluri to explain the various procedures available to interventional radiologists to address cancer tumors of the liver, and to generally educate the Court and the Jury about radio-frequency ablation, microwave ablation, and other treatment modalities available to interventional radiologist treating patients such as Erika Zak, and to assist the Court and the Jury to understand the medical vernacular that the evidence will include in this case.

Plaintiff expects Dr. Navuluri's testimony is expected to last 5–7 hours in Plaintiff's case in chief, not including time for Defendants' cross.

9. Dr. Skye Mayo (via prior testimony given in this case)

Dr. Skye Mayo is a surgical oncologist at Oregon Health Science University was one of Erika Zak's treating physician was Erika Zak's treating oncologist at Oregon Health Science University in Portland. He participated in her care during and after the time the defendants treated her. Plaintiffs intend to call him as treating physician to testify by his prior deposition about his care of Erika and what he observed regarding her physical, emotional, and psychological response to such treatment, as well as the basis for such treatment. Plaintiff also expects Dr. Mayo to testify about his personal remarks about Erika's cancer treatment journey that he witnessed and the prospect for her survival of her cancer, and the specific damage to her liver sustained during the ablation that required her to seek a liver transplant as her only remaining option to survive. Dr. Mayo will also testify about the extent to which any of the defendants or physicians in their employ consulted him for his opinion and input about Erika's course of treatment.

Plaintiff expects Dr. Mayo's testimony to last 30 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

10. Dr. Fergus Coakley\*

Dr. Fergus Coakley is an expert diagnostic radiologist and the Chair of the Department of Radiology at Oregon Health Science University. Plaintiff expects Dr. Coakley to testify to that the lesion was only 4 mm away from the critical structures in Erka's liver. Plaintiff retained Dr. Coakley after defendants first disclosed their defense that the central lesion was a full 12 mm away from the critical structures in Erika Zak's liver. Plaintiff further expects Dr. Coakley to testify about Erika's pre and post ablation radiological films demonstrate the extent of the damage the ablation caused to Erka's liver and the critical structures of the liver, why this damage led to her liver failure. Plaintiff also expect Dr. Coakley to testify on the radiological appearances of the catastrophic complications that followed the damaging ablation procedure, and how these injuries lead to Erika's liver failure and ultimate demise.

Plaintiff expects Dr. Coakley's testimony to last 2 hours in Plaintiff's case in chief, not including time for Defendants' cross.

\*Defendants object to Dr. Coakley's testimony as cumulative to Dr. DeMatteo and Dr. Navuluri.

11. Dr. Manan Shah

Dr. Manan Shah is a gastroenterologist and hepatologist. Plaintiff expects Dr. Shah to testify that Erika's pre and post lab test measurements of her liver function contradict the defendants' theories for Erika's liver failure, including that Erika Zak was progressing into liver failure before the ablation procedure and that Erika's eventual clinical course was caused by her hepatic arterial infusion pump.

Plaintiff expects Dr. Shah's testimony is expected to last 3 to 5 hours in Plaintiff's case in chief, not including time for Defendants' cross.



12. Julia Ziegler-Haynes\*

Julia Ziegler Haynes was a close friend of Erika Zak's since college and accompanied her to medical appointments at Memorial Sloan Kettering, including appointments in the months leading up to the ablation procedure. Plaintiff expects Julia to testify about what she witnessed defendants' physicians tell Erika about her condition leading up to the subject procedure and what she witnessed regarding the defendants' consultations with Erika regarding her treatment. Plaintiff also expects she will testify to what she observed in Erika Zak's physical abilities and mental outlook regarding her cancer prior to the ablation and how she witnessed that Erika's physical condition mental outlook changed after the ablation procedure.

Plaintiff expects Julia's testimony to last 15 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

\*Defendants object to Ms. Ziegler-Haynes as cumulative damages testimony.

13. Ariel Dunitz-Johnson\*

Ariel Dunitz-Johnson was friends with Erika Zak since high school. Plaintiff expects her to testify to the impact the ablation procedure had on Erika herself, specifically how her injury inspired her to advocate for others.

Plaintiff expects Ariel's testimony to last 15 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

\*Defendants object to Ms. Dunitz-Johnson as cumulative damages testimony.

14. Claire Cain Miller\*

Claire Cain Miller and Erika Zak were friends since they were 14-years-old. Plaintiff expects Claire to testify about what she witnessed regarding the physical and emotional toll that Erika's injuries caused her, Erika's aspirations for her life and family, and her final wishes once she believed her death was imminent.

Plaintiff expects Claire's testimony to last 15 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

\*Defendants object to Ms. Cain Miller as cumulative damages testimony.

15. Mickael Romaine\*

Mickael Romaine was friends with Erika Zak since 2004 and had children six months apart. Plaintiff expects Mickael to testify about Erika's life before the subject procedure, including Erika's experience as an artist and mother.

Mickael's testimony is expected to last 15 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

\*Defendants object to Ms. Romaine as cumulative damages testimony.

16. Doug Ulman\*

Doug Ulman is a close friend of Plaintiff Scott Powers from college and a cancer survivor. He was in close contact with Scott after the April 2017 ablation and is personally familiar with Scott and Erika's extraordinary efforts to seek a liver transplant to save her life. Plaintiff expects him to testify about how the stress from the irreparable damage the ablation caused Erika affected her and Scott mentally and emotionally and how those changes impacted Erika's family. Doug may also testify about his own experience as a cancer patient and survivor and the importance to him as a cancer patient to understand all the risks and alternative treatments available to make informed decisions about treatment.

Plaintiff expects Doug's testimony to last 30 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

\*Defendants object to Mr. Ulman as cumulative damages testimony.

17. Stan Smith

Stan Smith is an expert economist and Plaintiff expects to testify regarding Erika Zak's past lost earnings and Erika's future earning potential.

Plaintiff expects Dr. Smith's testimony to last 30 minutes in Plaintiff's case in chief, not including time for Defendants' cross.

18. S. Nahum Goldberg (via prior testimony given in this case)\*

Dr. Goldberg is Defendants' expert witness whom Plaintiff intends to call via prior testimony as detailed below. Plaintiff expects this testimony to include Dr. Goldberg's impressions and expert opinions regarding the available alternatives; the treatment Erika received at Memorial Sloan Kettering, including the ablation procedure; Erika's resulting injury; and Erika's condition before and after the ablation.

Plaintiff expects Dr. Goldberg's testimony to last 1 hour.

\*Defendants have no objections to Dr. Goldberg's substantive testimony, but object to any impeachment testimony and any testimony regarding claims dismissed by the Court's rulings on the motions *in limine* (e.g., MDTB).

**Witnesses Plaintiff may call if the need arises:**

L.P.

L.P. is the biological child of Erika Zak and Scott Powers and is a party to this case as a minor distributee of Erika Zak's Estate. Plaintiff anticipates calling L.P. to testify to the loss of Erika's guidance and training, and to authenticate her journal regarding how the loss of her mother has impacted her emotionally, if necessary.

Stephen Powers

Stephen Powers is Scott Powers' brother and may testify as to the emotional impact he has witnessed the loss of Erika's life has had on Scott and his niece L.P. He may also testify to the physical deterioration and disfigurement he witnessed Erika endure as a result of the damage inflicted on her by the defendants' ablation procedure.

Suzanne Kelson (subject to Plaintiff's offer of proof)\*

Suzanne Kelson is Memorial Sloan Kettering Cancer Center's corporate representative. She has been designated to testify regarding the Memorial Sloan Kettering Cancer Center's practices in recording and maintaining its electronic medical record.

\*Defendants object as this testimony was excluded pursuant to the Court's MIL Order. See Doc. 409, No. 15a.

Caroline Macuiba

Caroline Macuiba is a social worker at Oregon Health & Science University who attended to Erika Zak while she underwent care. She can testify to Erika's physical state and mental state of mind as she dealt with the day-to-day burdens of attending to her biliary drains she needed as a result of the damage caused by the ablation of April 10, 2017. She may also testify as to other difficulties and challenges Erika faced from day to day as a result of the damage Erika sustained from the April 10, 2017 ablation.

Dr. John Kaufman, M.D.

Dr. Kaufman is an interventional radiologist at Oregon Health Science University. He performed an emergency embolization of Erika's hepatic artery after it ruptured on July 4, 2017 due to the damage the April 10, 2017 ablation caused to her hepatic artery, saving her life as she faced the risk of bleeding to death.

Dr. Charles Martin III, M.D.

Dr. Charles Martin III is a diagnostic radiologist at the Cleveland Clinic. He is a treating physician of Erika Zak. He may testify to his treatment, including the causes of her liver failure necessitating transplant.

Dr. Koji Hashimoto

Dr. Koji Hashimoto is a transplant surgeon at the Cleveland Clinic. He is a treating physician of Erika Zak. He may testify to his treatment of Erika Zak, including the causes of her liver failure necessitating transplant and the transplant surgery.

**Defendants' List of Trial Witnesses:**

1. Dr. Constantinos Sofocleous
  - a. Dr. Sofocleous will testify to his care and treatment of Ms. Zak, and testify as to all claims alleged against him. He will testify that the location of the tumor did not contradict the ablation. He will also testify as to matters of causation as to the subsequent bleed and liver failure. He will testify that ablation was the most effective alternative and that any other alternatives were previously tried and were unsuccessful or were inferior. He will testify as to the condition of plaintiff's hepatic arteries prior to the ablation.
  - b. Length: 1 full day not including time for cross
2. Dr. Aaron Fischman
  - a. Dr. Fischman is Defendants' expert interventional radiologist. Dr. Fischman will testify on matters of standard of care, causation and damages in response to Plaintiff's claims of medical malpractice, wrongful death and lack of informed consent as asserted against Dr. Sofocleous. He will testify that the location of the tumor was not a contraindication to its removal. He will testify as to the condition of plaintiff's hepatic arteries prior to the ablation. He will testify consistent with his report and deposition.
  - b. Length: 1 full day not including time for cross
3. Dr. David Bernstein\*
  - a. Dr. Bernstein is Defendants' expert hepatologist. He will testify that the clinical, radiologic and pathologic aspects of Ms. Zak's condition indicated that her liver failure was due to the HAI pump treatment, and that the location and timing of the bleed indicated it was due to the pump.
  - b. Length: 3 hours not including time for cross

Plaintiff objects to the extent Dr. Bernstein's testimony exceeds the scope of his written report.
4. Dr. Neil Theise\*
  - a. Dr. Theise is Defendants' expert liver pathologist. Dr. Theise will testify on matters of causation and damages in response to all of Plaintiff's claims. He will testify in accordance with his report and deposition.
  - b. Length: 3-4 hours not including time for cross

Plaintiff objects to Dr. Theise's testimony as cumulative of Dr. Bernstein.

**Defendants' List of Witnesses – if need arises:**

1. Dr. Nancy Kemeny
  - a. Dr. Kemeny was Ms. Zak's primary treating oncologist at Memorial and referred Ms. Zak for the ablations performed by Dr. Sofocleous. Dr. Kemeny will testify as to her care and treatment of Ms. Zak, and will testify as to the claims alleged. She

will also testify as to matters of causation as to the subsequent bleed and liver failure. She will testify that ablation was the most effective alternative and that other alternatives were previously tried and were unsuccessful or were inferior.

- b. Length: ½ day not inclusive of time for cross
2. Dr. Michael Sadler
  - a. Dr. Sadler is Defendants' expert diagnostic radiologist. He will testify as to the condition of plaintiff's hepatic arteries prior to the ablation.
  - b. Length: 1 hour not inclusive of time for cross
3. Dr. Douglas Robinson
  - a. Dr. Robinson is Defendants' expert medical oncologist. He will also testify regarding Ms. Zak's cancer diagnosis, treatment, and prognosis.
  - b. Length: 1 hour not inclusive of time for cross
4. Dr. S. Nahum Goldberg
  - a. Dr. Goldberg is Defendants' second interventional radiology expert. He will testify consistent with Dr. Fischman as stated above and in accordance with his report and deposition.
  - b. Length: 2 hours not inclusive of time for cross
5. Dr. Amy Deipolyi
  - a. Dr. Deipolyi was Ms. Zak's subsequent treating interventional radiologist at Memorial. Dr. Deipolyi will testify that subsequent to the ablation there was no hepatic artery bleed, and that Ms. Zak's condition improved. She will also testify concerning her review of the pre-ablation imaging.
  - b. Length: 1-2 hours not inclusive of time for cross
6. Stephen Powers
  - a. Mr. Powers was present during prior visits with Dr. Sofocleous, and will testify regarding those interactions.
  - b. Length: 1 hours not inclusive of time for cross
7. Caroline Macuiba, LCSW (via prior video testimony in this case)
  - a. LCSW Macuiba was Ms. Zak's licensed clinical social worker at OHSU during her cancer care and medical treatment pre and post ablation and will testify regarding those interactions.
  - b. Length: 1-2 hours
8. Leah M. Keller, RN
  - a. RN Keller was Dr. Sofocleous' nurse at Memorial. RN Keller was present during the consent visit on March 22, 2017. RN Keller will testify regarding the consent visit and her involvement in Ms. Zak's care.

b. Length: 1-2 hours not inclusive of time for cross

**(h) Designations of all deposition testimony the parties anticipate offering as part of their respective cases in chief.**

**Plaintiff's Designations:**

Plaintiff designates deposition testimony from Dr. Constantinos Sofocleous, Dr. Nancy Kemeny, Dr. S. Nahum Goldberg, Suzanne Kelson, Dr. Skye Mayo, and Dr. Charles Lopez.

**Witness:** **Dr. Constantinos Sofocleous**

**Title or Role:** Defendant interventional radiologist at Memorial Sloan Kettering

**Deposition Date:** December 8, 2020

**Summary:** Dr. Sofocleous will testify to his training, background, and experience as an interventional radiologist and interventional oncologist; his peer-reviewed publications, speaking presentations, and other recorded statements regarding interventional radiology, including procedures performed; and his treatment of Erika Zak in this case.

**Reason:** Dr. Sofocleous is a party. Fed. R. Civ. Pro. 32(a)(3) ("An adverse party may use for any purpose the deposition of a party or anyone who, when deposed, was the party's officer, director, managing agent, or designee under Rule 30(b)(6) or 31(a)(4)").

**Counter-Designations:** Defendants will provide counter-designations in accordance with the Court's Order. See Doc. 414.

**Witness:** **Dr. Nancy Kemeny**

**Title or Role:** Oncologist and employee of Defendant Memorial Sloan Kettering

**Deposition Date:** December 17, 2020

**Summary:** Dr. Kemeny will testify to her training, background, and experience as an oncologist; practice treating patients with cancer in the liver; and her treatment of Erika Zak.

**Reason:** Dr. Kemeny has been identified as Defendant Memorial Sloan Kettering's agent. Fed. R. Civ. Pro. 32(a)(3) ("An adverse party may use for any purpose the deposition of a party or anyone who, when deposed, was the party's officer, director, managing agent, or designee under Rule 30(b)(6) or 31(a)(4)").

**Counter-Designations:** Defendants will provide counter-designations in accordance with the Court's Order. See Doc. 414.

**Witness:** **Dr. S. Nahum Goldberg**

**Title or Role:** Defendants' expert interventional radiologist

**Deposition Date:** March 16, 2021 and March 20, 2021

**Summary:** Dr. Goldberg is Defendants' expert witness whom Plaintiff intends to call via prior testimony as detailed below. Plaintiff expects this testimony to include Dr. Goldberg's impressions and expert opinions regarding the available alternatives; the treatment Erika received at Memorial Sloan Kettering, including the ablation procedure; Erika's resulting injury; and Erika's condition before and after the ablation.

**Reason:** Dr. Goldberg is located more than 100 miles away from the place of trial. Fed. R. Civ. Pro. 32(a)(4)(B).

**Counter-Designations:** Defendants will provide counter-designations in accordance with the Court's Order. See Doc. 414.

**Witness:** **Suzanne Kelson** (subject to Plaintiff's offer of proof)\*

**Title or Role:** Defendant Memorial Sloan Kettering's designated representative

**Deposition Date:** November 16, 2020

**Summary:** Suzanne Kelson is Memorial Sloan Kettering Cancer Center's corporate representative. She has been designated to testify regarding the Memorial Sloan Kettering Cancer Center's practices in recording and maintaining its electronic medical record.

**Reason:** Suzanne Kelson is Defendant's designated Federal Rule 30(b)(6) witness. Fed. R. Civ. Pro. 32(a)(3) ("An adverse party may use for any purpose the deposition of a party or anyone who, when deposed, was the party's officer, director, managing agent, or designee under Rule 30(b)(6) or 31(a)(4)").

**\*Objections:** Defendants object to this designation as the testimony has been excluded pursuant to the Court's MIL Order as irrelevant, prejudicial, a waste of time and confusing to the jury. See Doc. 409, No. 15a.

**Witness:** **Dr. Skye Mayo**

**Title or Role:** Erika Zak's treating surgical oncologist at Oregon Health Science University

**Deposition Date:** October 8, 2020

**Summary:** Dr. Skye Mayo is a surgical oncologist at Oregon Health Science University was one of Erika Zak's treating physician was Erika Zak's treating oncologist at Oregon Health Science University in Portland. He participated in her care during and after the time the defendants treated her. Plaintiffs intend to call him as treating physician to testify by his prior deposition about his care of Erika and what he observed regarding her physical, emotional, and psychological response to such treatment, as well as the basis for such treatment. Plaintiff also expects Dr. Mayo to testify about his personal remarks about Erika's cancer treatment journey that he witnessed and the prospect for her survival of her cancer, and the specific damage to her liver sustained during the ablation that required her to seek a liver transplant as her only remaining option to survive. Dr. Mayo will also testify about the extent to which any of the defendants or physicians in their employ consulted him for his opinion and input about Erika's course of treatment.

**Reason:** Dr. Mayo is located more than 100 miles away from the place of trial. Fed. R. Civ. Pro. 32(a)(4)(B).

**Counter-Designations:** Defendants will provide counter-designations in accordance with the Court's Order. See Doc. 414.

**Witness:** **Dr. Charles Lopez**

**Title or Role:** Erika Zak's treating oncologist at Oregon Health Science University

**Deposition Date:** November 5, 2020

**Summary:** Dr. Charles Lopez was Erika Zak's treating oncologist at Oregon Health Science University in Portland. He participated in her care during and after the time the defendants treated her. Plaintiffs intend to call him as treating physician to testify about his treatment of Erika and response to such treatment, as well as the basis for such treatment and the availability of such treatment, including immunotherapy, during the time the defendants were Erika Zak's primary cancer care treating physicians. Plaintiff also expects Dr. Lopez to testify whether any of the defendants or physicians in their employ consulted him about Erika's course of treatment and about his evaluation of Erika for the treatment he prescribed after she transferred her care to doctors at Oregon Health Science University, including Dr. Lopez.

**Reason:** Dr. Lopez is located more than 100 miles away from the place of trial. Fed. R. Civ. Pro. 32(a)(4)(B).

**Counter-Designations:** Defendants will provide counter-designations in accordance with the Court's Order. See Doc. 414.



**Defendants' Designations**

1. **Dr. Mayo** – if plaintiff does not designate Dr. Mayo during his case in chief
2. **Dr. Lopez** – if plaintiff does not designate Dr. Lopez during his case in chief
3. **Caroline Macuiba, LCSW** – defendants may designate Ms. Macuiba because she is located more than 100 miles away from the place of trial and is unavailable.
4. **Stephen Powers** – defendants may designate Mr. Powers if he is deemed unavailable. Mr. Powers is Plaintiff's brother and under his control.

**(i) A list of all proposed exhibits and demonstrative aids for each party's case in chief, marked with one star for no authenticity objection and two stars for no objections at all;**

For exhibits with objections other than authenticity, a statement of the nature of the objection and the Federal Rule of Evidence that is the basis for the objection. Any objections not made shall be deemed waived, and any exhibits not objected to shall be deemed admissible at trial;

**Plaintiff:**

Plaintiff reserves the right to use software to view radiological images in evidence at trial.

No.	Title	Objections
P-1.	Bates Number: Kemeny Emails_001 May 30, 2017; Emails between Dr. Nancy Kemeny and Dr. Skye Mayo.	★★
P-2.	Bates Number: Kemeny Emails_003–04 June 1, 2017; Emails between Dr. Nancy Kemeny and Dr. Skye Mayo.	★★
P-3.	Bates Number: Kemeny Emails_005–006 - September 22, 2017; Emails between Dr. Nancy Kemeny and Dr. Skye Mayo.	★★
P-4.	Bates Number: Kemeny Emails_007–008 - February 13, 2018; Emails between Dr. Nancy Kemeny and Dr. Skye Mayo.	★★
P-5.	Bates Number: Kemeny Emails_009–011 - July 6, 2017; Emails between Dr. Nancy Kemeny, Dr. Skye Mayo, and Dr. John Kaufman.	★★
P-6.	Bates Number MHCAD Emails 0001–04 - April 12, 2017 – April 14, 2017; Emails from Dr. Amy Deipolyi, Dr. Constantinos Sofocleous, Dr. Josephine Cool, and Dr. Chhavi Kumar.	★ Redact – 002 – “ <i>I am away from the center but</i> ” as irrelevant <u>see</u> Court's MIL Order (Doc. 409, No. 15c).
P-7.	Bates Number MHCAD EMAILS 0009 - June 1, 2017; Emails between Dr. Nancy Kemeny and Dr. Neil Segal.	★★

P-8.	Bates Number MHCAD EMAILS 0017–18, MHCAD EMAILS 0045 - April 21, 2017; Emails from Jonathan Silverman, Sandra Arida, Helen Loumeau, and Dr. Nancy Kemeny.	★★
P-9.	Bates Number MHCAD EMAILS 0021–0022 - April 3, 2017; Emails from Daphne Conseillant and Leah Keller.	★★
P-10.	Bates Number MHCAD EMAILS 0025–0029 - April 12, 2017 – April 14, 2017, May 9, 2017; Emails from Dr. Amy Deipolyi, Dr. Constantinos Sofocleous, Dr. Josephine Cool, Dr. Chhavi Kumar, and Leah Keller.	★ Redact – 026 – “ <i>I am away from the center but</i> ” as irrelevant <u>see</u> Court’s MIL Order (Doc. 409, No. 15c).
P-11.	Bates Number MHCAD Emails 0031–34, MHCAD Emails 0093, MHCAD Emails 109-11 - April 12, 2017 – April 14, 2017; Emails from Dr. Amy Deipolyi, Dr. Constantinos Sofocleous, Dr. Josephine Cool, Dr. Chhavi Kumar, and Dr. Nancy Kemeny.	★ Redact – 032 and 109 – “ <i>I am away from the center but</i> ” as irrelevant <u>see</u> Court’s MIL Order (Doc. 409, No. 15c).
P-12.	Bates Number: MHCAD Emails 0039 - April 19, 2017; Emails between Dr. Nancy Kemeny and Dr. Hans Gerdes.	★★
P-13.	Bates Number: Exhibit L_01–03 - May 5, 2017, May 7, 2017; Emails between Dr. Sofocleous, and Erika Zak, Lyn Brody, and Jorge Capote.	★ Irrelevant, misleading, prejudicial. Also, inadmissible hearsay, irrelevant re Dr. Sofocleous being away. <u>See</u> Court’s MIL Order (Doc. 409, No. 15c).
P-14.	10669434_1_7C547D2F-43 (Baby LP waiving to Erika. 9/1/2014)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-15.	11175416_9_B565FD23-53 (Family at the park, LP goes down slide. 4/18/2015)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-16.	11638133_6_41AB997B-56 (Baby LP in tub. 6/13/2015)	★ Irrelevant Prejudicial

		Cumulative - 1 of 10 pre-ablation family videos.
P-17.	11918649_8_508427A8-55 (Erika and baby LP dancing at a park. 9/8/2015)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-18.	12344532_5_ED304DBC-52 (Family teaching LP to kick a ball. 12/5/2015)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-19.	12551643_1_ECDBFEAB-46 (LP blowing out the candle at her 2nd birthday. 12/29/2014)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-20.	13610055_1_F7BD3E30-50 (LP and Erika at a parade. 7/4/2016)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-21.	13827892_1_AC823F1E-46 (Erika laughing as LP puts on lipstick. 7/24/2016)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-22.	14253228_1_CD49412D-62 (LP and Erika playing dress up. 9/3/2016)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-23.	16328899_2_49905352-36 (Video of LP eating a cookie, 1/28/2017)	★ Cumulative Prejudicial – 1 of 10 pre-ablation family videos.
P-24.	18031779_2_FE3519-60 (Video of LP, 4/19/2017)	★ Cumulative Prejudicial – 1 of 6 post-ablation videos.
P-25.	ZakCSV0000000115 (Erika's social media – Poem for LP, 5/16/2017)	Hearsay. <u>See</u> Court's MIL Order (Doc. 409, No. 13b).

		Cumulative Prejudicial
P-26.	35817062_4_B549E10A-58 (Video of LP swimming, 7/2/2018)	★ Irrelevant Prejudicial. Cumulative
P-27.	46144366_2_A6E5FA5C-59 (Erika's art – "Don't give up the ship", 11/18/2018)	Hearsay. <u>See</u> Court's MIL Order (Doc. 409, No. 13b). Cumulative Prejudicial
P-28.	68578135_1_1C166C74-23 (Erika's social media re being scared, week of 8/9/2019)	Hearsay. <u>See</u> Court's MIL Order (Doc. 409, No. 13b). Cumulative Prejudicial
P-29.	68669800_4_EFDB25DC-3, ZakCSV0000000116 (Erika's social media re regrets, week of 8/9/2019)	Hearsay. <u>See</u> Court's MIL Order (Doc. 409, No. 13b). Cumulative Prejudicial
P-30.	68816957_3_7857BEB3-1 (Erika's social media re swollen feet), week od	Hearsay. <u>See</u> Court's MIL Order (Doc. 409, No. 13b). Cumulative Prejudicial
P-31.	1.jpg (Erika's art for Loie, 2014–2019)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-32.	2.jpg (Erika's art – Silhouette, 2017)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-33.	13828805_1_97F402AF-46 (Erika's art, 7/27/2016)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)

P-34.	Bees (Erika's art, poster project possibly created in school or while living in SF. Collage to try variety of techniques, prior to 2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-35.	Building print (Erika's art, 3/31/2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-36.	Cups (Erika's art, 1994)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-37.	Hearts (Erika's art, 2016)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-38.	Houses sketch (Erika's art, 4/17/2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-39.	Ikat floral calm2 (Erika's art, 7/28/2008)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-40.	Jackalope repeat lime (Erika's art, 3/16/2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak's art. Irrelevant (lost earnings)
P-41.	Legs (Erika's art, prior to 2009)	★ Cumulative

		Prejudicial – 1 of 15 of Ms. Zak’s art. Irrelevant (lost earnings)
P-42.	Little houses print calm (Erika’s art, 4/20/2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak’s art. Irrelevant (lost earnings)
P-43.	Orchid print sky (Erika’s art, 7/15/2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak’s art. Irrelevant (lost earnings)
P-44.	Pods2 (Erika’s art, 2/23/2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak’s art. Irrelevant (lost earnings)
P-45.	Textiles (Erika’s art, 2009)	★ Cumulative Prejudicial – 1 of 15 of Ms. Zak’s art. Irrelevant (lost earnings)
P-46.	1 (Family photo, Spring of 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-47.	2 (Family photo, 12/25/2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-48.	3 (Family photo, early 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-49.	4 (Family photo, April 2016)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-50.	5 (Family photo, June 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-51.	6 (Family photo, April 4, 2017)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-52.	8 (Family photo, January 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-53.	9 (Family photo, October 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-54.	10 (Family photo, July 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-55.	11 (Family photo, March 30, 2017)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-56.	12 (Family photo, 9/6/2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-57.	13 (Family photo, 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-58.	14 (Family photo, May, 2016)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-59.	15 (Family photo, March 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-60.	17 (Family photo, 12/25/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-61.	18 (Family photo, 4/8/2017)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-62.	19 (Family photo, October 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-63.	20 (Family photo, Fall 2014)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-64.	21 (Family photo, March 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-65.	22 (Family photo, May 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-66.	23 (Family photo, 8/24/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-67.	24 (Family photo, 7/4/2016)	★ Cumulative



		Prejudicial – 1 of 70 pre-ablation family photos.
P-68.	25 (Family photo, 12/26/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-69.	26 (Family photo, 4/12/2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-70.	Pregnancy (Family photo, 2013)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-71.	493.jpg (Family photo, September 2010)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-72.	15833_1273935052618_1357194170_793848_2097728_n (Family photo, 2008-2009)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-73.	591200302.939118 (Family photo, 1983–1984)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-74.	591201411.070036 (Family photo, Spring/Fall 2003)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-75.	591201430.498810(Family photo, 2000)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-76.	591208716.505051(Family photo, 5/9/2000)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-77.	591210076.422010(Family photo, 2006)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-78.	591210544.609493(Family photo, Early 1999)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-79.	591220864.221848(Family photo, 2006)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-80.	Aisle.jpg (Family photo, 10/31/2009)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-81.	All three (Family photo, 9/6/2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-82.	Baby LP collage (7/15/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-83.	Carneros (November 2009)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-84.	Erika and Baby Loie.jpg (Fall 2014)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-85.	EZ and Loie on merry go round.jpg (5/24/2015)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-86.	EZ and SGP 2 (Family photo, 2004/2005?)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-87.	EZ and SGP Halloween (Family photo, 1999)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-88.	EZ and SGP (Family photo, Fall 2006)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-89.	EZ painting nails before ablation (Family photo, 4/9/2017)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-90.	Getting ready (Family photo 10/31/2009)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-91.	IMG_0029 (Family photo, Pre-2006)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-92.	IMG_0280 (Family photo, May 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-93.	IMG_7744 (Family photo, Loie's 3 <sup>rd</sup> birthday, Jan. 2017)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-94.	IMG_0238 (Family photo, 10/9/2015)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-95.	IMG_0515 (Family photo, 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-96.	IMG_0540 (Family photo, Loie's 2 <sup>nd</sup> Birthday, 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-97.	IMG_0753 (Family video, 3/24/2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-98.	IMG_2594 (Family photo, 7/20/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-99.	IMG_2671 (Family photo, 11/16/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-100.	IMG_4798 (Family photo, October 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-101.	IMG_6905 (Family photo, 7/10/2014)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-102.	IMG_7025 (Family photo, 2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-103.	IMG_7295 (Family photo, 10/31/2009)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-104.	IMG_7445 (Family photo, July 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-105.	IMG_7698 (Family photo, Spring 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-106.	IMG_7933 (Family photo, 9/28/2013)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-107.	IMG_8135 (Family photo, 2014/2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-108.	IMG_8245 (Family photos, Sept 2015)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-109.	Loie on beach (Family photo, 6/4/2016)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-110.	nov 2014 babymoon (Family photo, November 2013)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-111.	Pics from Scott's Phone Nov 2014 027 (Family photo, November 2014)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-112.	Pics from Scott's Phone Nov 2014 430 (Family photo, Mother's Day, 2014)	★ Cumulative

		Prejudicial – 1 of 70 pre-ablation family photos.
P-113.	Pictures - EZ.SP 028 (Family photo, Fall/Winter 2006)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-114.	Pictures - EZ.SP 036 (Family photo, 2009/2010)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-115.	Speech (Family photo, 10/31/2009)	★ Cumulative Prejudicial – 1 of 70 pre-ablation family photos.
P-116.	52017 OHSU hospital stay (May 2017)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-117.	Erika-Zak (Family photo, 08/22/2019 & 8/24/2016)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-118.	EZ and LP in hospital (08/22/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-119.	IMG_0004 (Family video, 8/24/2018)	★ Cumulative Prejudicial – 1 of 6 post-ablation videos.
P-120.	IMG_0017 (Family video, 8/26/2018)	★ Cumulative Prejudicial – 1 of 6 post-ablation videos.
P-121.	IMG_0030 (Family photo, 4/4/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-122.	IMG_0084 (Family photo, 4/9/2019)	★ Cumulative

		Prejudicial – 1 of 53 post-ablation photos.
P-123.	IMG_0274 (Family photo, 9/28/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-124.	IMG_0288 (Family photo, 9/28/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-125.	IMG_0417 (Family photo, 2018–2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-126.	IMG_0427 (Family photo, 10/27/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-127.	IMG_0437 (Family photo, 2018–2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-128.	IMG_0441 (Family photo, 5/30/2019)	Hearsay (text message) Cumulative Prejudicial Not disclosed during discovery
P-129.	IMG_0443 (Family photo, 05/17/2019)	Hearsay (text message) Cumulative Prejudicial Not disclosed during discovery
P-130.	IMG_0470 (Family photo, May 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-131.	IMG_0465 (Family photo, 5/23/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-132.	IMG_0555 (Family photo, 2018)	★ Cumulative

		Prejudicial – 1 of 53 post-ablation photos.
P-133.	IMG_0628 (Family photo, 6/7/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-134.	IMG_0675 (Family photo, 6/14/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-135.	IMG_0838 (Family photo, 9/26/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-136.	IMG_0888 (Family photo, 12/25/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-137.	IMG_0895 (Family video, 12/27/2018)	★ Cumulative Prejudicial – 1 of 6 post-ablation videos.
P-138.	IMG_0953 (Family photo, 7/8/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-139.	IMG_0956 (Family photo, 7/8/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-140.	IMG_0957 (Family photo, 7/8/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-141.	IMG_0964 (Family photo, 2/26/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-142.	IMG_0996 (Family photo, January 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-143.	IMG_0998 (Family photo, Jan 2019)	★ Cumulative



		Prejudicial – 1 of 53 post-ablation photos.
P-144.	IMG_1074 (Family photo, 7/30/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-145.	IMG_1126 (Family photo, 2/6/19)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-146.	IMG_1131 (Family photo, 2/7/19)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-147.	IMG_1152 (Family photo, 2/12/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-148.	IMG_0086 (Family photo, 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-149.	IMG_1156 (Family photo, 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-150.	IMG_1161 (Family photo, 08/22/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-151.	IMG_1164 (Family photo, 08/22/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-152.	IMG_1251 (Family photo, 2/19/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-153.	IMG_1252 (Family video, 2/19/2019)	★ Cumulative Prejudicial – 1 of 6 post-ablation videos.
P-154.	IMG_1444 (Family photo, 2019)	★ Cumulative

		Prejudicial – 1 of 53 post-ablation photos.
P-155.	IMG_1636 (Family photo, 10/5/2019)	★ Irrelevant Prejudicial – funeral photo
P-156.	IMG_2348 (Family photo, CNN article, May 2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos, and reference to CNN
P-157.	IMG_3482 (Family photo, 7/29/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-158.	IMG_3483 (Family photo, 7/29/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-159.	IMG_3484 (Family photo, 5/27/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-160.	IMG_3485(Family photo, 6/29/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-161.	IMG_3486 (Family photo, 5/30/2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-162.	IMG_3488 (Family photo 9/26/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-163.	IMG_3796 (Family video, 2/13/2019)	★ Cumulative Prejudicial – 1 of 6 post-ablation videos.
P-164.	IMG_7728 (Family photo, 8/27/2017)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-165.	IMG_7770 (Family photo, 8/28/2017)	★

		Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-166.	IMG_8044 (Family photo, 9/28/2017)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-167.	IMG_8180 (Family photo 10/14/2017)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-168.	IMG_8926 (Family photo, 2/21/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-169.	IMG_9277 (Family photo, 5/13/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-170.	IMG_9723 (Family photo, 7/20/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-171.	IMG_9742 (Family photo, 2019, 7/21/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-172.	IMG_9827 (Family photo, Spring 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-173.	IMG_9880 (Family photo, 8/8/2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-174.	IMG_9899 (Family photo, 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-175.	Loie imitating (jaundiced) Erika (Family photo, CNN article, May 2018)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos, and reference to CNN

P-176.	Swollen Feet.HEIC (Swollen feet, May 2019)	★ Cumulative Prejudicial – 1 of 53 post-ablation photos.
P-177.	Video 2 (Family video, May 1, 2018 10:55 PM)	Excluded under Rule 403 <u>see</u> Court's MIL Order (Doc. 409, No. 13d).
P-178.	ZAK_NY 019440-43 Letters from Erika to Scott and Loie.	★★ (Defs' MIL denied)
P-179.	ZAK_NY 019446 Erika's list of symptoms.	★★ (Defs' MIL denied)
P-180.	ZAK_NY 019448 Erika's poem.	★★ (Defs' MIL denied)
P-181.	Elena Nadia Petre & Constantinos Sofocleous, <i>Thermal Ablation in the Management of Colorectal Cancer Patients with Oligometastatic Liver Disease</i> , 33 VISCERAL MED. 62 (January 31, 2017).	★ Requires foundation FRE 803(18) FRE 403
P-182.	M. Ang et al., <i>Venous thrombosis following microwave ablation of hepatocellular carcinoma and liver metastases</i> , 27:3 JVIR S30 (March 1, 2016).	★ Requires foundation FRE 803(18) FRE 403
P-183.	L. Crocetti, S.N. Goldberg et al, <i>The ten commandments of liver ablation: expert discussion and report from Mediterranean Interventional Oncology (MIOLive) congress 2017</i> , 22 Eur. Rev. for Med. & Pharmacological Sci. 3896 (2018).	★ Excluded <u>see</u> Court's MIL Order (Doc. 409, No. 15b)
P-184.	Petra Ruemmele et al, <i>Secondary Sclerosing Cholangitis</i> , 6 NATURE REVIEWS GASTROENTEROLOGY & HEPATOLOGY 287 (May 2009).	★ Requires foundation FRE 803(18) FRE 403
P-185.	F. Edward Boas, Lisa Bode, and Constantinos Sofocleous, <i>Radioembolization of Colorectal Liver Metastases: Indications, Technique, and Outcomes</i> , 58:9 (Sup.2) J. NUCLEAR MED., 58:9, 104S (September 2017) (submitted March 16, 2017).	★ Requires foundation FRE 803(18) FRE 403
P-186.	A. Cercek et al., <i>PD-1 Blockade in Mismatch Repair- Deficient, Locally Advanced Rectal Cancer</i> , 386:25 New. England. J. Med. 2363 (June 23, 2022).	★ Irrelevant FRE 803(18) FRE 403
P-187.	National Comprehensive Cancer Network (NCCN) Guidelines Version 2.2017 Panel Members Colon Cancer (March 13, 2017).	★ Requires foundation FRE 803(18) FRE 403

P-188.	Skye Mayo, <i>Thermal Ablative Therapies for Secondary Hepatic Malignancies</i> , 16:2 CANCER J. 111 (March 1, 2010).	★ Irrelevant FRE 803(18) FRE 403
P-189.	Omid Khalilzadeh et al, <i>Proposal of a New Adverse Event Classification by the Society of Interventional Radiology Standards of Practice Committee</i> , 28 JVIR 1432 (2017) (submitted March 26, 2017).	★ Irrelevant Prejudicial FRE 803(18) FRE 403
P-190.	Jashodeep, D., & Kemeny, N., <i>Role of Hepatic Artery Infusion Chemotherapy in Treatment of Initially Unresectable Colorectal Liver Metastases A Review</i> , 154:8 JAMA SURG 768, 769 (Aug. 2019).	★ Requires foundation FRE 803(18) FRE 403
P-191.	Mikhail T. Silk, Constantinos Sofocleous et al, <i>Percutaneous Ablation of Peribiliary Tumors with Irreversible Electroporation</i> , 25:1 J. VASCULAR & INTERVENTIONAL RADIOLOGY 112 (January 2014).	★ Requires foundation FRE 803(18) FRE 403
P-192.	Jason Lewis, <i>Pathological Patterns of Biliary Disease</i> , 10:5 CLINICAL LIVER DISEASE 107 (Nov. 2017).	★ Requires foundation FRE 803(18) FRE 403
P-193.	Kyung Rae Kim & Sarah Thomas, <i>Complications of Image-Guided Thermal Ablations of Liver and Kidney Neoplasms</i> , 31 SEMINARS INTERVENTIONAL RADIOLOGY 138 (June 2014).	★ Requires foundation FRE 803(18) FRE 403
P-194.	Bethesda, <i>Floxuridine, LiverTox: Clinical and Research Information on Drug-Induced Liver Injury</i> , NAT'L INST. DIABETES & DIGESTIVE & KIDNEY DISEASES (Feb. 2, 2018).	★ Irrelevant FRE 803(18) FRE 403
P-195.	Jashodeep Datta & Nancy E. Kemeny et al, <i>Role of Hepatic Artery Infusion Chemotherapy in Treatment of Initially Unresectable Colorectal Liver Metastases</i> , 154:8 JAMA SURGERY 768 (August 2009).	★ Requires foundation FRE 803(18) FRE 403
P-196.	Julie Leal & T. Peter Kingham, <i>Hepatic Artery Infusion Chemo for Liver Malignancy</i> , 24 SURGICAL ONCOLOGY CLINICS NORTH AM. 121 (2015).	★ Requires foundation FRE 803(18) FRE 403
P-197.	I. Kurilova, Nancy Kemeny, Constantinos Sofocleous et al., <i>Radiation segmentectomy of hepatic metastases with Y-90 glass microspheres</i> , 46 Abdominal Radiology 3428 (February 19, 2021).	★ Irrelevant (standard of care in 2017) FRE 803(18) FRE 403
P-198.	W. Shady, Constantinos Sofocleous et al, <i>Percutaneous Microwave versus Radiofrequency Ablation of Colon</i>	★

	<i>Cancer Liver Metastases: Ablation with clear margins (A0) provides the best local tumor control</i> , 29 JVIR 268 (Feb. 2018).	Irrelevant (standard of care in 2017) FRE 803(18) FRE 403
P-199.	Marco Dollinger et al, <i>Irreversible Electroporation of Malignant Hepatic Tumors - Alterations in Venous Structures at Subacute Follow-Up and Evolution at Mid-Term Follow-Up</i> , 10:8 PLOS ONE (August 13, 2015).	★ Requires foundation FRE 803(18) FRE 403
P-200.	T Peter Kingham, Ronald P DeMatteo, Constantinos T Sofocleous et al, <i>Ablation of Perivascular Hepatic Malignant Tumors with Irreversible Electroporation</i> , 215:3 J. AM. COLLEGE SURGEONS 379 (Sep. 2012).	★ Requires foundation FRE 803(18) FRE 403
P-201.	W.Y. Lau et al., <i>Anatomy of the Hepatic Hilum</i> , Hilar Cholangiocarcinoma (2013).	★ Requires foundation FRE 803(18) FRE 403
P-202.	William C Jackson et al, <i>Comparison of Stereotactic Body Radiation Therapy and Radiofrequency Ablation in the Treatment of Intrahepatic Metastases</i> , 100:4 INTERNATIONAL JOURNAL OF RADIATION ONCOLOGY, BIOLOGY, PHYSICS 950 (March 15, 2018).	★ Irrelevant FRE 803(18) FRE 403
P-203.	Russel C. Langan, Ronald P. DeMatteo et al, <i>Recurrence Patterns Following Irreversible Electroporation for Hepatic Malignancies</i> , 115:6 J. SURGICAL ONCOLOGY 704 (May 2017).	★ Irrelevant FRE 803(18) FRE 403
P-204.	Alice Gillams, Nahum Goldberg, Constantinos Sofocleous et al, <i>Thermal ablation of colorectal liver metastases: a position paper by an international panel of ablation experts, the interventional oncology sans frontières meeting 2013</i> , 25:12 EUROPEAN RADIOLOGY 3438 (December 2015).	★ Requires foundation FRE 803(18) FRE 403
P-205.	Roberto Iezzi et al, “ <i>Primum Non Nocere</i> ” in <i>Interventional Oncology for Liver Cancer: How to Reduce the Risk for Complications?</i> , 10:9 LIFE 2020 180 (September 6, 2020).	★ Irrelevant FRE 803(18) FRE 403
P-206.	Nancy Kemeny, Constantinos Sofocleous et al, <i>Liver-Directed and Systemic Therapies for Colorectal Cancer Liver Metastases</i> , 42:1 CARDIOVASCULAR & INTERVENTIONAL RADIOLOGY (July 2019).	★ Irrelevant (to standard of care in 2017) FRE 803(18) FRE 403
P-207.	MP Senthilkumar et al, <i>Management of pseudo-aneurysm in the hepatic artery after laparoscopic cholecystectomy</i> , 98:7 ANNALS THE ROYAL COLLEGE SURGEONS OF ENGLAND 456 (September 2016).	★ Requires foundation FRE 803(18) FRE 403

P-208.	ACR–SIR–SPR PRACTICE PARAMETER ON INFORMED CONSENT FOR IMAGE-GUIDED PROCEDURES, American College of Radiology (2021).	★ Irrelevant FRE 803(18) FRE 403
P-209.	Andreas H. Mahnken et al, <i>CIRSE Clinical Practice Manual</i> , 44 CARDIOVASCULAR & INTERVENTIONAL RADIOLOGY 1323 (July 6, 2021).	★ Irrelevant FRE 803(18) FRE 403
P-210.	Samuel L. Rice, Constantinos Sofocleous et al, <i>The Management of Colorectal Cancer Liver Metastases: The Interventional Radiology Viewpoint</i> , 103:3 INT’L J. RADIATION ONCOLOGY BIOLOGY PHYSICS 537 (March 1, 2019).	★ Irrelevant (to standard of care in 2017) FRE 803(18) FRE 403
P-211.	William J. Shae, Jr. et al, <i>Sclerosing Cholangitis Associated with Hepatic Arterial FUDR: Radiographic Histologic Correlation</i> , 146:4 Am. Research J. 717 (April 1986).	★ Requires foundation FRE 803(18) FRE 403
P-212.	Akira Kusakabe et al, <i>Chemotherapy-Induced Sclerosing Cholangitis Caused by Systemic Chemotherapy</i> , 6:7 ACG CASE REPORTS J. (July 2019).	★ Requires foundation FRE 803(18) FRE 403
P-213.	Subhendu Mohanty, <i>Emergency hepatic artery embolization in a patient with post-traumatic ruptured hepatic artery pseudoaneurysm</i> , 7:3 J. EMERGENCY, TRAUMA & SHOCK 246, <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4126131/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4126131/</a>	★ Requires foundation FRE 803(18) FRE 403
P-214.	Kyle J. Napier et al, <i>Hepatic Arterial Infusion Pumps: What the Radiologist Needs to Know</i> , 41 RADIOLOGICAL SOCIETY N. AM. 895 (2021).	★ Irrelevant FRE 803(18) FRE 403
P-215.	Kaori Ito, et al, <i>Biliary Sclerosis after Hepatic Arterial Infusion Pump Chemotherapy for Patients with Colorectal Cancer Liver Metastasis: Incidence, Clinical Features, and Risk Factors</i> , 19 Annals Surgical Oncology 1609 (2012).”	★ Requires foundation FRE 803(18) FRE 403
P-216.	Dr. Rakesh Navuluri’s curriculum vitae.	★ Hearsay Cumulative Waste of time
P-217.	Radiological images used in Dr. Rakesh Navuluri’s report pages 9–14, 17.	★ Needs proper expert testimony
P-218.	Dr. Ronald DeMatteo’s curriculum vitae.	★



		Hearsay Cumulative Waste of time
P-219.	Radiological images and medical records used in Dr. Ronald DeMatteo's report pages 14–15, Exhibit C, Exhibit I and Exhibit J.	Images and medical records (overbroad and not specific) Exhibit I Emprint (Irrelevant, misleading and prejudicial) Exhibit J (needs proper expert testimony)
P-220.	Dr. Fergus Coakley's curriculum vitae.	★ Hearsay Cumulative Waste of time
P-221.	Radiological images used in Dr. Fergus Coakley's report pages 2–4.	★ Needs proper expert testimony
P-222.	Dr. Manon Shah's curriculum vitae.	★ Hearsay Cumulative Waste of time
P-223.	Stan Smith's curriculum vitae.	★ Hearsay Cumulative Waste of time
P-224.	ZAK_NY 000042–73, OHSU, 6/1/2018, Dr's Note.	★ Redact – 053 and 066 – “ <i>In contact with CNN for upcoming profile in mid-May.</i> ” Under Rule 403. <u>See</u> Court's MIL Order (Doc. 409, No. 17a).
P-225.	ZAK_NY 000095–108, OHSU, 5/26/2018, Record for admission for cholangitis (pt 1).	★★
P-226.	ZAK_NY 000593–604, OHSU, 5/12/2018, Record for admission for cholangitis (pt 1).	★★
P-227.	ZAK_NY 000593–604, OHSU, 4/22/2018, Record for admission for cholangitis (pt 1).	★★



P-228.	ZAK_NY 000799–820, OHSU, 4/2/2018, IR Procedure w/some bleeding and embolic coils extracted during drain exchange (pt 1).	★★
P-229.	ZAK_NY 001000–03, OHSU, 3/19/2018, Mayo Letter.	★ Redact – 1003 – “ <i>and she would likely have complete cure of her disease.</i> ” – <u>see</u> Court’s MIL Order (Doc. 409, No. 8).
P-230.	ZAK_NY 001004–07, OHSU, 3/15/2018, Gastrointestinal Consult.	★★
P-231.	ZAK_NY 001019–22, OHSU, 3/14/2018, Dr. Lopez Letter.	★ Exclude if Drs. DeMatteo and Kemeny transplant letters are excluded
P-232.	ZAK_NY 001050–82, OHSU, 3/7/2018, Hepatology/Oncology progress note.	★★
P-233.	ZAK_NY 001090–114, OHSU, 2/26/2018, Surgical Note - Esophagogastroduodenoscopy (pt 1).	★★
P-234.	ZAK_NY 001763–840, OHSU, 2/5/2018, Admission for infected biloma and drain exchange (pt 1).	★★
P-235.	ZAK_NY 001992–2046, OHSU, 1/30/2018, black tarry stool - esophageal varix (pt 1).	★★
P-236.	ZAK_NY 002446–98, OHSU, 1/13/2018, ER for digested blood in stool (pt 1).	★★
P-237.	ZAK_NY 002891–923, OHSU, 12/27/2017, Hematology follow up, PMS2 and MSH2 loss.	★★
P-238.	ZAK_NY 003040–49, OHSU, 12/14/2017, Tumor board says no surgical options or IR options.	★★
P-239.	ZAK_NY 003050–76, OHSU, 12/14/2017, Endoscopic procedure, colonoscopy.	★★
P-240.	ZAK_NY 003177–212, OHSU, 12/6/2017, Surgical Oncology Office Visit, Dr. Skye Mayo Letter.	★★
P-241.	ZAK_NY 003245, OHSU, 12/5/2017, Labs (2).	★★
P-242.	ZAK_NY 003383–443, OHSU, 11/15/2017, Admission for biliary drain check and exchange.	★★
P-243.	ZAK_NY 003875–921, OHSU, 10/3/2017, Pain Center.	★★
P-244.	ZAK_NY 004059–112, OHSU, 9/21/2017, Left and Right Biliary Exchange Due to Occlusion.	★★
P-245.	ZAK_NY 004135–43, OHSU, 9/9/2017, Erika Question - Bleeding from drain, nose, gums.	★★
P-246.	ZAK_NY 004318–35, OHSU, 9/5/2017, New Right sided Drain (pt 1).	★★

P-247.	ZAK_NY 004628-90, OHSU, 9/1/2017, ER Visit - bleeding in drain but no admission.	★★
P-248.	ZAK_NY 004706-40, OHSU, 9/1/2017, Biliary Drain Removal.	★★
P-249.	ZAK_NY 004806-44, OHSU, 8/30/2017, Surgical Oncology Office Visit.	★★
P-250.	ZAK_NY 004946-54, OHSU, 8/17/2017, ER Visit for abdominal pressure, jaundice, and drain issues (pt 1).	★★
P-251.	ZAK_NY 005126-39, OHSU, 8/16/2017, Surgical Oncology - Office Visit.	★★
P-252.	ZAK_NY 005152-203, OHSU, 8/14/2017, ERCP Stent placed.	★★
P-253.	ZAK_NY 005268-81, OHSU, 8/7/2017, PET Scan.	★★
P-254.	ZAK_NY 005379-90, OHSU, 7/27/2017, Infection from pump removal surgery (pt 1).	★★
P-255.	ZAK_NY 005559-65, OHSU, 7/26/2017, Bleeding after removal of Pump surgery.	★★
P-256.	ZAK_NY 005614-31, OHSU, 7/24/2017, Removal of Hepatic Arterial Infusion Pump (pt 1).	★★
P-257.	ZAK_NY 005745-818, OHSU, 7/12/2017, Surgical oncologist - Office Visit.	★★
P-258.	ZAK_NY 005871-903, OHSU, 7/4/2017, Hepatic artery bleed embolized (pt 1).	★★
P-259.	ZAK_NY 006302-12, OHSU, 6/22/2017, Erika calls doctor over GI concern.	★★
P-260.	ZAK_NY 006737-53, OHSU, 6/6/2017, IR - Getting her drain checked.	★★
P-261.	ZAK_NY 006758-63, OHSU, 6/5/2017, Infectious Disease Note.	★★
P-262.	ZAK_NY 006910-13, OHSU, 5/16/2017, Called Oncologist about symptoms.	★★
P-263.	ZAK_NY 006943-81, OHSU, 5/10/2017, Surgical oncology - Office Visit.	★★
P-264.	ZAK_NY 007039-42, OHSU, 4/18/2017, Difficult post procedure recovery.	★★
P-265.	ZAK_NY 007096-157, OHSU, 4/4/2017, ER for fever, discharged from ER.	★★
P-266.	ZAK_NY 007252-53, OHSU, 3/24/2017, Labs.	★★
P-267.	ZAK_NY 008882-84, OHSU, 4/22/2016, High fever but declines ER.	★★
P-268.	ZAK_NY 008885-933, OHSU, 4/21/2016, ER - fever, heart racing, Discharged with CT.	★★
P-269.	ZAK_NY 009426-33, OHSU, 7/1/2019, Hematology/ Oncology History.	★★

P-270.	ZAK_NY 009710-17, OHSU, records until 7/1/2019, Oncology Treatment (pt 1).	★★
P-271.	ZAK_NY 009870, OHSU, 5/4/2014, 6/3/2014, 9/1/2015, Labs.	★★
P-272.	ZAK_NY 009966-67, MSK, 9/11/2014-9/19/2014, Hospital admission.	★★
P-273.	ZAK_NY 010034-42, OHSU, 9/15/2015, CT sent to OHSU from MSKCC - cancer the same.	★★
P-274.	ZAK_NY 010096-7, MSK, 7/30/2014, CT guided liver angiography.	★★
P-275.	ZAK_NY 001763-840, OHSU, 2/16/2018, Admission for infected biloma and drain exchange (pt 1).	★★
P-276.	ZAK_NY 010447-79, OHSU, 5/16/2017 ER visit and Hospital Admission (pt 1).	★★
P-277.	ZAK_NY 011701-02, MSK, 4/21/2017, Culture on abdominal fluid - Infection.	★★
P-278.	ZAK_NY 011722-28, MSK, 4/14/2017, Labs - Very high liver levels and low red blood cells.	★★
P-279.	ZAK_NY 011750-61, MSK, 4/12/2017, Labs - very high liver levels.	★★
P-280.	ZAK_NY 011763, MSK, 4/11/2017, Labs - Hepatitis.	★★
P-281.	ZAK_NY 011880, MSK, 3/23/2016, Labs.	★★
P-282.	ZAK_NY 011878, MSK, 3/23/2016, Labs.	★★
P-283.	ZAK_NY 011974-77, MSK, 9/15/2014-9/18/2014, Labs.	★★
P-284.	ZAK_NY 011979-82, MSK, 9/11/2014-9/14/2014, Labs.	★★
P-285.	ZAK_NY 011987-9, MSK, 9/10/2014, Labs.	★★
P-286.	ZAK_NY 012000, MSK, 7/30/2014, Labs.	★★
P-287.	ZAK_NY 012024, MSK, 4/21/2017, Consent - surgery on catheter.	★ Irrelevant (informed consent)
P-288.	ZAK_NY 012039, MSK, 4/13/2017, Consent - thoracentesis.	★ Irrelevant (informed consent)
P-289.	ZAK_NY 012041, MSK, 4/14/2017, Consent - paracentesis.	★ Irrelevant (informed consent)
P-290.	ZAK_NY 012043, MSK, 4/10/2017, Consent - biopsy and ablation.	★ Irrelevant (informed consent) Misleading Prejudicial
P-291.	ZAK_NY 012062, MSK, 3/22/2017, Consent Ablation.	★★

P-292.	ZAK_NY 011972, MSK, 9/19/2014, Labs.	★★
P-293.	ZAK_NY 011959, MSK, 9/24/2014, Labs.	★★
P-294.	ZAK_NY 011954, MSK, 10/22/2014, Labs.	★★
P-295.	ZAK_NY 011949, MSK, 11/19/2014, Labs.	★★
P-296.	ZAK_NY 011941, MSK, 2/4/2015, Labs.	★★
P-297.	ZAK_NY 011938, MSK, 4/1/2015, Labs.	★★
P-298.	ZAK_NY 011933, MSK, 4/29/2015, Labs.	★★
P-299.	ZAK_NY 011927, MSK, 5/27/2015, Labs.	★★
P-300.	ZAK_NY 011923, MSK, 6/24/2015, Labs.	★★
P-301.	ZAK_NY 011917, MSK, 7/22/2015, Labs.	★★
P-302.	ZAK_NY 011915, MSK, 8/19/2015, Labs.	★★
P-303.	ZAK_NY 011911, MSK, 9/16/2015, Labs.	★★
P-304.	ZAK_NY 011905, MSK, 10/14/2015, Labs.	★★
P-305.	ZAK_NY 011902, MSK, 11/18/2015, Labs.	★★
P-306.	ZAK_NY 009610, OHSU, 12/2/2015, Labs.	★★
P-307.	ZAK_NY 009585, OHSU, 12/8/2015, Labs.	★★
P-308.	ZAK_NY 011898, MSK, 12/21/2015, Labs.	★★
P-309.	ZAK_NY 009532 OHSU, 12/29/2015, Labs.	★★
P-310.	ZAK_NY 009440, OHSU, 1/12/2016, Labs.	★★
P-311.	ZAK_NY 011894, MSK, 1/27/2016, Labs.	★★
P-312.	ZAK_NY 009393, OHSU, 1/29/2016, Labs.	★★
P-313.	ZAK_NY 009260, OHSU, 2/12/2016, Labs.	★★
P-314.	ZAK_NY 011891, MSK, 2/21/2016, Labs.	★★
P-315.	ZAK_NY 009175, OHSU, 2/26/2016, Labs.	★★
P-316.	ZAK_NY 009103, OHSU, 3/10/2016, Labs.	★★
P-317.	ZAK_NY 011885, MSK, 3/21/2016, Labs.	★★
P-318.	ZAK_NY 011876, MSK, 3/24/2016, Labs.	★★
P-319.	ZAK_NY 011875, MSK, 3/23/2016, Labs (3).	★★
P-320.	ZAK_NY 011873, MSK, 3/25/2016, Labs (3).	★★
P-321.	ZAK_NY 011871, MSK, 3/25/2016, Labs (2).	★★
P-322.	ZAK_NY 011864–5, MSK, 3/25/2016, Labs.	★★
P-323.	ZAK_NY 011861, MSK, 3/26/2016, Labs.	★★
P-324.	ZAK_NY 011859, MSK, 3/27/2016, Labs.	★★
P-325.	ZAK_NY 011870, MSK, 3/28/2016, Labs.	★★
P-326.	ZAK_NY 011868, MSK, 3/29/2016, Labs.	★★
P-327.	ZAK_NY 011851–2, MSK, 4/1/2016, Labs.	★★
P-328.	ZAK_NY 011843, MSK, 4/6/2016, Labs.	★★
P-329.	ZAK_NY 008950, OHSU, 4/20/2016, Labs.	★★
P-330.	ZAK_NY 008909, OHSU, 4/21/2016, Labs.	★★

P-331.	ZAK_NY 008767, MSK, 4/27/2016, Labs.	★★
P-332.	ZAK_NY 008832, OHSU, 4/29/2016, Labs.	★★
P-333.	ZAK_NY 008741, OHSU, 5/13/2016, Labs.	★★
P-334.	ZAK_NY 011832, MSK, 5/25/2016, Labs.	★★
P-335.	ZAK_NY 008649, OHSU, 5/27/2016, Labs.	★★
P-336.	ZAK_NY 008524, OHSU, 6/10/2016, Labs.	★★
P-337.	ZAK_NY 011824, MSK, 6/22/2016, Labs.	★★
P-338.	ZAK_NY 008502, OHSU, 6/24/2016, Labs.	★★
P-339.	ZAK_NY 008412, OHSU, 7/8/2016, Labs.	★★
P-340.	ZAK_NY 011820, MSK, 7/20/2016, Labs.	★★
P-341.	ZAK_NY 008375, OHSU, 7/20/2016, Labs.	★★
P-342.	ZAK_NY 008365, OHSU, 7/22/2016, Labs.	★★
P-343.	ZAK_NY 008308, OHSU, 8/3/2016, Labs.	★★
P-344.	ZAK_NY 011817, MSK, 8/17/2016, Labs.	★★
P-345.	ZAK_NY 011810–1, MSK, 8/30/2016, Labs.	★★
P-346.	ZAK_NY 008235, OHSU, 9/9/2016, Labs.	★★
P-347.	ZAK_NY 008178, OHSU, 9/23/2016, Labs.	★★
P-348.	ZAK_NY 011796, MSK, 10/5/2016, Labs.	★★
P-349.	ZAK_NY 008069, OHSU, 10/7/2016, Labs.	★★
P-350.	ZAK_NY 007986, OHSU, 10/21/2016, Labs.	★★
P-351.	ZAK_NY 007905, OHSU, 11/4/2016, Labs.	★★
P-352.	ZAK_NY 007856, OHSU, 11/16/2016, Labs.	★★
P-353.	ZAK_NY 007829, OHSU, 11/18/2016, Labs.	★★
P-354.	ZAK_NY 011793, MSK, 11/29/2016, Labs.	★★
P-355.	ZAK_NY 007810, OHSU, 12/2/2016, Labs.	★★
P-356.	ZAK_NY 007738, OHSU, 12/16/2016, Labs.	★★
P-357.	ZAK_NY 007695, OHSU, 12/30/2016, Labs.	★★
P-358.	ZAK_NY 007649, OHSU, 1/13/2017, Labs.	★★
P-359.	ZAK_NY 007624–5, OHSU, 1/24/2017, Labs.	★★
P-360.	ZAK_NY 007614, OHSU, 1/27/2017, Labs.	★★
P-361.	ZAK_NY 007527, OHSU, 2/2/2017, Labs.	★★
P-362.	ZAK_NY 007511, OHSU, 2/10/2017, Labs.	★★
P-363.	ZAK_NY 007448, OHSU, 2/17/2017, Labs.	★★
P-364.	ZAK_NY 007396, OHSU, 2/24/2017, Labs.	★★
P-365.	ZAK_NY 007325, OHSU, 3/10/2017, Labs.	★★
P-366.	ZAK_NY 011777, MSK, 3/22/2017, Labs.	★★
P-367.	ZAK_NY 011781, MSK, 3/22/2017, Labs (2).	★★
P-368.	ZAK_NY 007253, OHSU, 3/24/2017, Labs (2).	★★

P-369.	ZAK_NY 007104-6, OHSU, 4/4/2017, ER Visit – Fever chief complaint – considered sepsis and did not require hospitalization, Labs.	★★
P-370.	ZAK_NY 011774, MSK, 4/10/2017, Labs.	★★
P-371.	ZAK_NY 011772, MSK, 4/11/2017, Labs.	★★
P-372.	ZAK_NY 011768-9, MSK, 4/11/2017, Labs (2).	★★
P-373.	ZAK_NY 011754, MSK, 4/12/2017, Labs.	★★
P-374.	ZAK_NY 011743-4, MSK, 4/13/2017, Labs.	★★
P-375.	ZAK_NY 011724-5, MSK, 4/14/2017, Labs.	★★
P-376.	ZAK_NY 011717-8, MSK, 4/15/2017, Labs.	★★
P-377.	ZAK_NY 011713-4, MSK, 4/16/2017, Labs.	★★
P-378.	ZAK_NY 011707, MSK, 4/17/2017, Labs.	★★
P-379.	ZAK_NY 011710, MSK, 4/17/2017, Labs (2).	★★
P-380.	ZAK_NY 011703, MSK, 4/18/2017, Labs.	★★
P-381.	ZAK_NY 011705, MSK, 4/18/2017, Labs (2).	★★
P-382.	ZAK_NY 011694-5, MSK, 4/21/2017, Labs.	★★
P-383.	ZAK_NY 011688-9, MSK, 4/22/2017, Labs.	★★
P-384.	ZAK_NY 011683, MSK, 4/23/2017, Labs.	★★
P-385.	ZAK_NY 011685, MSK, 4/23/2017, Labs (2).	★★
P-386.	ZAK_NY 011680, MSK, 4/24/2017, Labs.	★★
P-387.	ZAK_NY 011675, MSK, 4/25/2017, Labs.	★★
P-388.	ZAK_NY 011677, MSK, 4/25/2017, Labs (2).	★★
P-389.	ZAK_NY 011673, MSK, 4/26/2017, Labs.	★★
P-390.	ZAK_NY 011598, MSK, 4/28/2017, Labs.	★★
P-391.	ZAK_NY 011670, MSK, 4/28/2017, Labs.	★★
P-392.	ZAK_NY 011593, MSK, 4/29/2017, Labs.	★★
P-393.	ZAK_NY 011661, MSK, 4/29/2017, Labs.	★★
P-394.	ZAK_NY 011603, MSK, 4/29/2017, Labs.	★★
P-395.	ZAK_NY 011590, MSK, 4/30/2017, Labs.	★★
P-396.	ZAK_NY 011605, MSK, 4/30/2017, Labs.	★★
P-397.	ZAK_NY 011656, MSK, 4/30/2017, Labs.	★★
P-398.	ZAK_NY 011594, MSK, 5/1/2017, Labs.	★★
P-399.	ZAK_NY 011608, MSK, 5/1/2017, Labs.	★★
P-400.	ZAK_NY 011614, MSK, 5/2/2017, Labs.	★★
P-401.	ZAK_NY 011609, MSK, 5/3/2017, Labs.	★★
P-402.	ZAK_NY 011643, MSK, 5/3/2017, Labs.	★★
P-403.	ZAK_NY 006987, OHSU, 5/10/2017, Labs.	★★
P-404.	ZAK_NY 010475-6, OHSU, 5/16/2017, Labs - Per MD note, missing lab form.	★★
P-405.	ZAK_NY 010755, OHSU, 5/17/2017, Labs.	★★



P-406.	ZAK_NY 010758–9, OHSU, 5/17/2017, Labs (2).	★★
P-407.	ZAK_NY 010782, OHSU, 5/18/2017, Labs.	★★
P-408.	ZAK_NY 010786, OHSU, 5/18/2017, Labs (2).	★★
P-409.	ZAK_NY 010789, OHSU, 5/19/2017, Labs.	★★
P-410.	ZAK_NY 010808–9, OHSU, 5/20/2017, Labs.	★★
P-411.	ZAK_NY 010836–7, OHSU, 5/21/2017, Labs.	★★
P-412.	ZAK_NY 010887, OHSU, 5/22/2017, Labs.	★★
P-413.	ZAK_NY 010927, OHSU, 5/23/2017, Labs.	★★
P-414.	ZAK_NY 010934, OHSU, 5/24/2017, Labs.	★★
P-415.	ZAK_NY 010948, OHSU, 5/25/2017, Labs.	★★
P-416.	ZAK_NY 010961, OHSU, 5/26/2017, Labs.	★★
P-417.	ZAK_NY 010977, OHSU, 5/27/2017, Labs.	★★
P-418.	ZAK_NY 010984, OHSU, 5/28/2017, Labs.	★★
P-419.	ZAK_NY 010080, MSK, 9/11/2014, Surgery: Cholecystectomy (Gallbladder removal), Liver & peritoneal biopsies, BSO, Right hemicolectomy	★★
P-420.	UNOS p49-51/207, UNOS, 3/24/2016; 10/2016–3/2017; 4/10/2017; 7/20/2019, Partial right hepatectomy, Ablations in segment 2 and 8, lysis of adhesions; Hepatic Arterial Infusion Pump therapy with FOLFIRI x 13; Ablation of new liver lesions; Initial MELD Exception	★ Hearsay within hearsay Prejudicial in accord with Court's MIL Order (Doc. 409, No. 11).
P-421.	ZAK_NY 010992, OHSU, 5/29/2017, Labs.	★★
P-422.	ZAK_NY 010995, OHSU, 5/29/2017, Labs (2).	★★
P-423.	ZAK_NY 011004, OHSU, 5/30/2017, Labs.	★★
P-424.	ZAK_NY 011012, OHSU, 5/31/2017, Labs.	★★
P-425.	ZAK_NY 011089, OHSU, 6/1/2017, Labs.	★★
P-426.	ZAK_NY 011104, OHSU, 6/2/2017, Labs.	★★
P-427.	ZAK_NY 011116, OHSU, 6/3/2017, Labs.	★★
P-428.	ZAK_NY 006694, OHSU, 6/6/2017, Labs.	★★
P-429.	ZAK_NY 006551, OHSU, 6/12/2017, Labs.	★★
P-430.	ZAK_NY 006555, OHSU, 6/12/2017, Labs (2).	★★
P-431.	ZAK_NY 006336, OHSU, 6/21/2017, Labs.	★★
P-432.	ZAK_NY 006277, OHSU, 6/26/2017, Labs.	★★
P-433.	ZAK_NY 005972–3, OHSU, 7/4/2017, Labs.	★★
P-434.	ZAK_NY 005997–8, OHSU, 7/4/2017, Labs (2).	★★
P-435.	ZAK_NY 006002–4, OHSU, 7/5/2017, Labs (4).	★★
P-436.	ZAK_NY 006007–8, OHSU, 7/5/2017, Labs (3).	★★
P-437.	ZAK_NY 006011, OHSU, 7/5/2017, Labs.	★★

P-438.	ZAK_NY 006013, OHSU, 7/5/2017, Labs (2).	★★
P-439.	ZAK_NY 006018–9, OHSU, 7/6/2017, Labs.	★★
P-440.	ZAK_NY 006023–4, OHSU, 7/7/2017, Labs.	★★
P-441.	ZAK_NY 005827, OHSU, 7/11/2017, Labs.	★★
P-442.	ZAK_NY 005577, OHSU, 7/25/2017, Labs.	★★
P-443.	ZAK_NY 005420–1, OHSU, 7/27/2017, Labs.	★★
P-444.	ZAK_NY 005257, OHSU, 8/7/2017, Labs.	★★
P-445.	ZAK_NY 005156, OHSU, 8/14/2017, Labs.	★★
P-446.	ZAK_NY 005119, OHSU, 8/16/2017, Labs.	★★
P-447.	ZAK_NY 005094, OHSU, 8/17/2017, Labs.	★★
P-448.	ZAK_NY 004983, OHSU, 8/18/2017, Labs.	★★
P-449.	ZAK_NY 004986, OHSU, 8/18/2017, Labs (2).	★★
P-450.	ZAK_NY 004988, OHSU, 8/19/2017, Labs.	★★
P-451.	ZAK_NY 004990, OHSU, 8/20/2017, Labs.	★★
P-452.	ZAK_NY 004927, OHSU, 8/23/2017, Labs.	★★
P-453.	ZAK_NY 004865, OHSU, 8/25/2017, Labs.	★★
P-454.	ZAK_NY 004858, OHSU, 8/28/2017, Labs.	★★
P-455.	ZAK_NY 004820, OHSU, 8/30/2017, Labs.	★★
P-456.	ZAK_NY 004658, OHSU, 9/1/2017, Labs.	★★
P-457.	ZAK_NY 004386, OHSU, 9/5/2017, Labs.	★★
P-458.	ZAK_NY 004443, OHSU, 9/6/2017, Labs.	★★
P-459.	ZAK_NY 004452, OHSU, 9/7/2017, Labs.	★★
P-460.	ZAK_NY 004454, OHSU, 9/8/2017, Labs.	★★
P-461.	ZAK_NY 004276, OHSU, 9/12/2017, Labs.	★★
P-462.	ZAK_NY 004154–5, OHSU, 9/18/2017, Labs.	★★
P-463.	ZAK_NY 004127, OHSU, 9/19/2018, Labs.	★★
P-464.	ZAK_NY 004043, OHSU, 9/27/2017, Labs.	★★
P-465.	ZAK_NY 003858–9, OHSU, 10/3/2017, Labs.	★★
P-466.	ZAK_NY 003762–3, OHSU, 10/18/2017, Labs.	★★
P-467.	ZAK_NY 003703–4, OHSU, 10/24/2017, Labs.	★★
P-468.	ZAK_NY 003602, OHSU, 11/1/2017, Labs.	★★
P-469.	ZAK_NY 003477–9, OHSU, 11/14/2017, Labs.	★★
P-470.	ZAK_NY 003338, OHSU, 11/21/2017, Labs.	★★
P-471.	ZAK_NY 003243, OHSU, 12/5/2017, Labs.	★★
P-472.	ZAK_NY 003100, OHSU, 12/11/2017, Labs.	★★
P-473.	ZAK_NY 003103, OHSU, 12/11/2017, Labs (2).	★★
P-474.	ZAK_NY 002976, OHSU, 12/16/2017, Labs.	★★
P-475.	ZAK_NY 015854, CC, 12/18/2017, Labs.	★★
P-476.	ZAK_NY 015857, CC, 12/18/2017, Labs (2).	★★



P-477.	ZAK_NY 002867, OHSU, 12/27/2017, Labs.	★★
P-478.	ZAK_NY 002869, OHSU, 12/27/2017, Labs (2).	★★
P-479.	ZAK_NY 002551, OHSU, 1/13/2018, Labs.	★★
P-480.	ZAK_NY 002545, OHSU, 1/13/2018, Labs (2).	★★
P-481.	ZAK_NY 002383, OHSU, 1/17/2018, Labs.	★★
P-482.	ZAK_NY 002278, OHSU, 1/30/2018, Labs.	★★
P-483.	ZAK_NY 002117–8, OHSU, 1/31/2018, Labs.	★★
P-484.	ZAK_NY 002129, OHSU, 2/1/2018, Labs.	★★
P-485.	ZAK_NY 001865, OHSU, 2/5/2018, Labs.	★★
P-486.	ZAK_NY 001877, OHSU, 2/5/2018, Labs (2).	★★
P-487.	ZAK_NY 001882, OHSU, 2/6/2018, Labs.	★★
P-488.	ZAK_NY 001707, OHSU, 2/7/2018, Labs.	★★
P-489.	ZAK_NY 001582, OHSU, 2/14/2018, Labs.	★★
P-490.	ZAK_NY 010224, OHSU, 2/17/2018, Labs.	★★
P-491.	ZAK_NY 010218, OHSU, 2/17/2018, Labs (2).	★★
P-492.	ZAK_NY 010240, OHSU, 2/17/2018, Labs (3).	★★
P-493.	ZAK_NY 010251, OHSU, 2/18/2018, Labs.	★★
P-494.	ZAK_NY 010255, OHSU, 2/19/2018, Labs.	★★
P-495.	ZAK_NY 010260, OHSU, 2/20/2018, Labs.	★★
P-496.	ZAK_NY 010269, OHSU, 2/20/2018, Labs (2).	★★
P-497.	ZAK_NY 010271, OHSU, 2/21/2018, Labs.	★★
P-498.	ZAK_NY 010277, OHSU, 2/22/2018, Labs.	★★
P-499.	ZAK_NY 010283, OHSU, 2/23/2018, Labs.	★★
P-500.	ZAK_NY 001224, OHSU, 2/26/2018, Labs.	★★
P-501.	ZAK_NY 001227, OHSU, 2/26/2018, Labs (2).	★★
P-502.	ZAK_NY 001247–8, OHSU, 2/27/2018, Labs.	★★
P-503.	ZAK_NY 001032, OHSU, 3/7/2018, Labs.	★★
P-504.	ZAK_NY 000966, OHSU, 3/28/2018, Labs.	★★
P-505.	ZAK_NY 000834, OHSU, 4/2/2018, Labs.	★★
P-506.	ZAK_NY 000837–8, OHSU, 4/3/2018, Labs.	★★
P-507.	ZAK_NY 000732, OHSU, 4/18/2018, Labs.	★★
P-508.	ZAK_NY 000735, OHSU, 4/18/2018, Labs (2).	★★
P-509.	ZAK_NY 000626–7, OHSU, 4/22/2018, Labs (2).	★★
P-510.	ZAK_NY 000630, OHSU, 4/22/2018, Labs.	★★
P-511.	ZAK_NY 000634, OHSU, 4/23/2018, Labs.	★★
P-512.	ZAK_NY 000642, OHSU, 4/24/2018, Labs.	★★
P-513.	ZAK_NY 000495–6, OHSU, 5/9/2018, Labs (2).	★★
P-514.	ZAK_NY 000498–9, OHSU, 5/9/2018, Labs.	★★
P-515.	UNOS p25–27/207, UNOS, 8/9/2019– Patient History.	★

		Hearsay within hearsay Prejudicial Redact – 25 – “ <i>This is a 39 year old mother is currently in liver failure due to complications related to a previous ablation procedure in 2017, associated with prior h/o colon cancer.</i> ” <u>See</u> Court’s MIL Order (Doc. 409, No. 11)
P-516.	UNOS p200/207, UNOS, 5/11/2018, Put on transplant list – Patient History.	★★
P-517.	ZAK_NY 000338–9, OHSU, 5/12/2018, Labs.	★★
P-518.	ZAK_NY 000351, OHSU, 5/13/2018, Labs.	★★
P-519.	ZAK_NY 000366, OHSU, 5/14/2018, Labs (2).	★★
P-520.	ZAK_NY 000369, OHSU, 5/14/2018, Labs.	★★
P-521.	ZAK_NY 000150–1, OHSU, 5/27/2018, Labs.	★★
P-522.	ZAK_NY 000153, OHSU, 5/27/2018, Labs (2).	★★
P-523.	ZAK_NY 000166, OHSU, 5/28/2018, Labs.	★★
P-524.	ZAK_NY 000170–1, OHSU, 5/29/2018, Labs.	★★
P-525.	ZAK_NY 016158, CC, 6/7/2018, Labs.	★★
P-526.	ZAK_NY 019290, CC, 6/11/2018, Labs.	★★
P-527.	UNOS p170-172/207, UNOS, 6/11/2018; Labs.	★★
P-528.	ZAK_NY 016181–2, CC, 6/13/2018–6/28/2018, Labs.	★★
P-529.	UNOS p161-163/207, UNOS, 7/3/2018, Labs.	★★
P-530.	UNOS p158-160/207, UNOS, 7/10/2018, Labs.	★★
P-531.	ZAK_NY 016367–9, CC, 7/19/2018, Labs.	★★
P-532.	ZAK_NY 016383–4, CC, 7/24/2018, Labs.	★★
P-533.	ZAK_NY 016506, CC, 7/31/2018, Labs.	★★
P-534.	ZAK_NY 016501–3, CC, 8/1/2018, Labs.	★★
P-535.	ZAK_NY 016498–9, CC, 8/2/2018, Labs.	★★
P-536.	ZAK_NY 016495–6, CC, 8/3/2018, Labs.	★★
P-537.	ZAK_NY 016385–6, CC, 8/13/2018, Labs (3).	★★
P-538.	ZAK_NY 016680, CC, 8/13/2018, Labs.	★★
P-539.	ZAK_NY 016682, CC, 8/13/2018, Labs (2).	★★
P-540.	ZAK_NY 019297, CC, 8/16/2018, Labs.	★★

P-541.	ZAK_NY 019295, CC, 8/17/2018, Labs.	★★
P-542.	ZAK_NY 019298, CC, 8/24/2018, Labs.	★★
P-543.	ZAK_NY 019300, CC, 8/24/2018, Labs (2).	★★
P-544.	ZAK_NY 016736–7, CC, 8/28/2018, Labs.	★★
P-545.	ZAK_NY 016792–3, CC, 9/18/2018, Labs.	★★
P-546.	ZAK_NY 016183–4, CC, 9/21/2018, Labs.	★★
P-547.	ZAK_NY 016947–9, CC, 9/27/2018, Labs.	★★
P-548.	ZAK_NY 016944–6, CC, 9/28/2018, Labs.	★★
P-549.	ZAK_NY 016942–3, CC, 9/29/2018, Labs.	★★
P-550.	ZAK_NY 016938, CC, 9/30/2018, Labs.	★★
P-551.	ZAK_NY 016184–5, CC, 10/12/2018, Labs.	★★
P-552.	ZAK_NY 017283–4, CC, 10/26/2018, Labs.	★★
P-553.	ZAK_NY 017441, CC, 11/2/2018, Labs.	★★
P-554.	ZAK_NY 017428–9, CC, 11/23/2018, Labs.	★★
P-555.	ZAK_NY 017527, CC, 11/23/2018, Labs (2).	★★
P-556.	ZAK_NY 017431, CC, 12/17/2018, Labs.	★★
P-557.	ZAK_NY 017639–40, CC, 12/23/2018, Labs.	★★
P-558.	ZAK_NY 017637, CC, 12/24/2018, Labs.	★★
P-559.	ZAK_NY 019308, CC, 1/2/2019, Labs.	★★
P-560.	ZAK_NY 019311, CC, 1/25/2019, Labs.	★★
P-561.	ZAK_NY 017933–4, CC, 2/12/2019, Labs.	★★
P-562.	ZAK_NY 017979–80, CC, 3/1/2019, Labs.	★★
P-563.	ZAK_NY 017934–5, CC, 3/8/2019, 4/2/2019, Labs.	★★
P-564.	ZAK_NY 017936–7, CC, 4/2/2019, 4/16/2019, Labs.	★★
P-565.	ZAK_NY 018236–8, CC, 4/17/2019, Labs.	★★
P-566.	ZAK_NY 018326, CC, 4/26/2019, Labs.	★★
P-567.	ZAK_NY 018395–6, CC, 5/17/2019, Labs.	★★
P-568.	ZAK_NY 018416, CC, 6/1/2019, Labs.	★★
P-569.	UNOS p43-45/207, UNOS, 6/8/2019, Labs.	★★
P-570.	ZAK_NY 019313–4, CC, 7/10/2019, Labs.	★★
P-571.	UNOS p35-36/207, UNOS, 7/12/2019, Labs & MELD data.	★ Hearsay within hearsay Prejudicial in accord with Court's MIL Order (Doc. 409, No. 11).
P-572.	ZAK_NY 018704–6, CC, 7/25/2019, Labs.	★★
P-573.	ZAK_NY 018840–1, CC, 7/30/2019, Labs (3).	★★
P-574.	ZAK_NY 018844, CC, 7/30/2019, Labs (4).	★★

P-575.	ZAK_NY 018833, CC, 7/30/2019, Labs.	★★
P-576.	ZAK_NY 018835, CC, 7/30/2019, Labs (2).	★★
P-577.	ZAK_NY 018831, CC, 8/1/2019, Labs.	★★
P-578.	ZAK_NY 018705–7, CC, 8/22/2019, Labs.	★★
P-579.	ZAK_NY 019197, CC, 8/22/2019, Labs (2).	★★
P-580.	ZAK_NY 011981–2, MSK, 9/11/2014–9/12/2014, Labs.	★★
P-581.	ZAK_NY 011980, MSK, 9/13/2014, Labs.	★★
P-582.	ZAK_NY 009950, UCSF, 4/3/2015, 4/8/2015, 4/15/2015, Labs - Per MD note, missing lab form.	★★
P-583.	ZAK_NY 009938, UCSF, 5/13/2015, 6/10/2015, Labs.	★★
P-584.	ZAK_NY 009927, UCSF, 6/10/2015, Labs.	★★
P-585.	ZAK_NY 009918, UCSF, 7/2/2015, Labs.	★★
P-586.	ZAK_NY 009912, UCSF, 7/8/2015, 9/1/2015, Labs.	★★
P-587.	ZAK_NY 009879, UCSF, 8/5/2015, Labs - per MD note, missing lab form.	★★
P-588.	ZAK_NY 009863, UCSF, 9/1/2015, Labs.	★★
P-589.	ZAK_NY 009976–7, OHSU 10/28/2015, Labs - Per MD note, missing lab form.	★★
P-590.	ZAK_NY 011649, MSK, 5/1/2017, Labs.	★★
P-591.	ZAK_NY 002866, OHSU, 12/27/2017, Labs (3).	★★
P-592.	ZAK_NY 009216–7, MSK, 3/24/2016–3/30/2016, Hospital Admissions - after surgery Hepatopancreatobiliary performed 03/24/2016.	★★
P-593.	ZAK_NY 015671–3, MSK, 4/1/2016, ER Visit – Fever (Admitted).	★★
P-594.	ZAK_NY 012434–6, MSK, 4/2/2016, IR procedure Notes - Abscess/Collection drainage of perihepatic abscess; Drainage catheter left in place.	★★
P-595.	ZAK_NY 008891–3, OHSU, 4/21/2016, ER Visit – Recurrent fevers, shortness of breath, palpitations.	★★
P-596.	ZAK_NY 015494–5, MSK, 4/10/2017, IR Report – IR procedural right liver PET ablation, needle biopsy of liver body.	★★
P-597.	ZAK_NY 012218–20, MSK, 4/10/2017–4/18/2017, Hospital Admissions – had ablation 4/10 of the caudate lobe & seg. 2, admitted for post-procedure monitoring.	★★
P-598.	ZAK_NY 015474, MSK, 4/13/17, Procedure Report & IR Report – ultrasound-guided right thoracentesis .	★★
P-599.	ZAK_NY 007078–80, MSK, 4/21/2017–4/26/2017, Hospitalization – admitted through UCC for management of fever and right upper quad pain.	★★
P-600.	ZAK_NY 015456–7, MSK, 4/21/2017, IR report – CT and ultrasound-guided right thoracentesis.	★★

P-601.	ZAK_NY 007089–91, MSK, 4/28/2017–5/2/2017, Hospitalization – admitted through UCC for pain and fever – leakage from drain.	★★
P-602.	ZAK_NY 012666–8, MSK, 4/28/2017–5/2/2017, Hospitalization – admitted through UCC for pain and fever – leakage from drain.	★★
P-603.	ZAK_NY 006952, OHSU, 5/10/2017, Procedure – Biloma drain removal.	★★
P-604.	ZAK_NY 010452–7, OHSU, 5/16/2017–6/3/2017, Hospitalization – bile leak and biloma.	★★
P-605.	ZAK_NY 010478, OHSU, 5/16/2017–6/3/2017, Hospitalization – bile leak and biloma (2).	★★
P-606.	ZAK_NY 011564, OHSU, 5/16/2017–6/3/2017, Final principal diagnosis – cholangitis, perihepatic fluid collection with necrotic liver.	★★
P-607.	ZAK_NY 011122–3, OHSU, 5/17/2017, IR drain procedure - Developed T. Bili of 11; significant central biliary injury.	★★
P-608.	ZAK_NY 011442, OHSU, 5/23/2017, Procedure – removal of drain non-tunneled pigtail right lateral and upper quadrant & removal of port/portacath left chest porta chest single.	★★
P-609.	ZAK_NY 011454, OHSU, 5/24/2017, Procedure – removed left arterial port single.	★★
P-610.	ZAK_NY 011481, OHSU, 5/26/2017, Procedure – removed hepatic arterial infusion port left abdomen.	★★
P-611.	ZAK_NY 11136–7, OHSU, 5/31/2017, IR drain procedure – successfully inserted a 14 French drain into an intrahepatic biloma.	★★
P-612.	ZAK_NY 010644–5, OHSU, 6/1/2017, Procedure – PICC line placed.	★★
P-613.	ZAK_NY 006741–2, OHSU, 6/6/2017, Procedure – IR drain procedure.	★★
P-614.	ZAK_NY 011438, OHSU, 6/14/2017, Procedure – removal of PICC line Single Lumen Non-Tunneled Valved Right Arm Basilic 4 Fr 1 in clinic (2).	★★
P-615.	ZAK_NY 006508, OHSU, 6/14/2017, Procedure – removal of PICC line Single Lumen Non-Tunneled Valved Right Arm Basilic 4 Fr 1 in clinic.	★★
P-616.	ZAK_NY 006057, OHSU, 7/4/2017–7/7/2017, Hospital admission – bleeding common hepatic artery – IR procedure performed – admitted to ICU.	★★
P-617.	ZAK_NY 005923, OHSU, 7/4/2017, Procedure – IR angiogram and embolization of atrophic common hepatic artery.	★★

P-618.	ZAK_NY 006029, OHSU, 7/4/2017, Procedure – IR angiogram and embolization of atrophic common hepatic artery.	★★
P-619.	ZAK_NY 006032, OHSU, 7/6/2017, Procedure – IR drain procedure – drainage catheter exchange with injection.	★★
P-620.	ZAK_NY 005627–8, OHSU, 7/24/2017, Procedure – removal of hepatic arterial infusion pump (HAI pump removal).	★★
P-621.	ZAK_NY 005495, OHSU, 7/27/2017–7/29/2017, Hospital admission – hematoma of surgical site.	★★
P-622.	ZAK_NY 005639–40, OHSU, 7/28/2017, Procedure – ultrasound needle aspiration.	★★
P-623.	ZAK_NY 005305, OHSU, 8/2/2017, Procedure – bulbs and tubing extension from JP biliary drain replaced.	★★
P-624.	ZAK_NY 004893, OHSU, 8/14/2017, Procedure note (anesthesia note): ERCP performed.	★★
P-625.	ZAK_NY 005009–10, OHSU, 8/17/2017–8/20/2017, Hospital admission – principal final diagnosis: Biloma.	★★
P-626.	ZAK_NY 004977–8, OHSU, 8/18/2017, Procedure op note – conversion of biloma drain to internal/external biliary drain.	★★
P-627.	ZAK_NY 004991–3, OHSU, 8/18/2017, Procedure op note – conversion of biloma drain to internal/external biliary drain.	★★
P-628.	ZAK_NY 003074, OHSU, 9/1/2017, OP report – upper GI endoscopy.	★★
P-629.	ZAK_NY 004874–9, OHSU, 9/1/2017, OP report – upper GI endoscopy.	★★
P-630.	ZAK_NY 004633–4, OHSU, 9/1/2017, ER visit – potential bleeding status post biliary stent removal.	★★
P-631.	ZAK_NY 004334–5, OHSU, 9/5/2017–9/8/2017, Hospital admission – admitted for diagnosis of Bacteremia (gram positive bacteremia).	★★
P-632.	ZAK_NY 004458–9, OHSU, 9/5/2017, OP report procedure – external biliary drainage catheter placement.	★★
P-633.	ZAK_NY 004460–1, OHSU, 9/5/2017, OP report: fluoroscopically guided biliary tube check and exchange.	★★
P-634.	ZAK_NY 004326, OHSU, 9/5/2017, OP report: fluoroscopically guided biliary tube check and exchange.	★★
P-635.	ZAK_NY 004070–1, OHSU, 9/21/2017, OP report: IR draink procedure – biliary tube exchange, (right-internal, left internal/external).	★★
P-636.	ZAK_NY 003588–90, OHSU, 11/8/2017, Metal Coil in biliary drain.	★★

P-637.	ZAK_NY 003396–7, OHSU, 11/15/2017, OP report: procedure biliary tube exchange.	★★
P-638.	ZAK_NY 003185, OHSU, 12/6/2017, Surgical oncology office visit.	★★
P-639.	ZAK_NY 003105–6, OHSU, 12/11/2017, OP report: IR drain procedure. Bilateral biliary catheter checks.	★★
P-640.	ZAK_NY 002952–3, OHSU, 12/16/2017, ER visit: fevers and rigors x1 day – did not require hospitalization.	★★
P-641.	ZAK_NY 002738–9, OHSU, 1/4/2018, Procedure: colonoscopy.	★★
P-642.	ZAK_NY 002497, OHSU, 1/13/2018, ER visit: melena and acute blood loss anemia (Admitted).	★★
P-643.	ZAK_NY 002616, OHSU, 1/13/18–1/16/2018, Hospital admission – diagnosed with upper GI bleed secondary to esophageal varix, melena, and acute blood loss anemia.	★★
P-644.	ZAK_NY 002520–1, OHSU, 1/14/2018, OP report: procedure – EGD.	★★
P-645.	ZAK_NY 001998, OHSU, 1/30/2018, ER visit: 1 episode of dark, tarry stool, red output from medial biloma drain, and increasing nausea/abdominal distension (Admitted).	★★
P-646.	ZAK_NY 002095, OHSU, 1/30/2018–2/1/2018, Hospital admission – esophageal varices presented with blood.	★★
P-647.	ZAK_NY 002081, OHSU, 1/30/2018, Procedure: EGD.	★★
P-648.	ZAK_NY 001828–9, OHSU, 2/5/2018–2/6/2018, Hospital admission: subacute decreased biloma drain output.	★★
P-649.	ZAK_NY 001887–9, OHSU, 2/5/2018, OP report: procedure – IR drain procedure, PBD and biloma drain exchange.	★★
P-650.	ZAK_NY 001514, OHSU, 2/14/2018, ER visit: abdominal distension and bloody output from biliary drain (Admitted).	★★
P-651.	ZAK_NY 001551, OHSU, 2/14/2018–2/15/2018, Hospital admission: bloody drainage from biliary drain, thought to be venous, stable after observation.	★★
P-652.	ZAK_NY 010135, OHSU, 2/16/2018–2/23/2018, Hospital admission: fever, unspecified fever cause, biloma, jaundice, shingles rash, biliary drain displacement.	★★
P-653.	ZAK_NY 001114, OHSU, 2/26/2018–3/2/2018, Hospital admission: EGD procedure with bleeding varix unable to be banded, injected with sclerosant.	★★
P-654.	ZAK_NY 000844, OHSU, 4/2/2018, OP report: procedure – IR drain procedure biliary tube exchange.	★★



P-655.	ZAK_NY 000860, OHSU, 4/2/2018–4/3/2018, Hospital admission/observation: discharge note.	★★
P-656.	ZAK_NY 000805, OHSU, 4/2/2018–4/3/2018, Hospital admission/observation: discharge note.	★★
P-657.	ZAK_NY 000604, OHSU, 4/22/2018–4/24/2018, Hospital admission.	★★
P-658.	ZAK_NY 000389, OHSU, 5/12/2018–5/14/2018, Hospital admission.	★★
P-659.	ZAK_NY 016129, OHSU, 5/12/2018–5/14/2018, Hospital Admission Note.	★★
P-660.	ZAK_NY 000195, OHSU, 5/26/2018–5/29/2018, Hospital admission.	★★
P-661.	ZAK_NY 016237, CC, 6/12/2018, OP report: Cholangiogram, bilateral.	★★
P-662.	ZAK_NY 019330–2, CC, 6/12/2018, OP report: Cholangiogram, bilateral (2).	★★
P-663.	ZAK_NY 016430, CC, 7/31/2018, ER visit: fever (Admitted).	★★
P-664.	ZAK_NY 016436–7, CC, 7/31/2018–8/3/2018, Hospital admission: fevers, antibiotics and blood transfusion.	★★
P-665.	ZAK_NY 017196–7, CC, 10/11/2018, Procedure report: re-suture biliary drains.	★★
P-666.	ZAK_NY 017279, CC, 10/25/2018–10/26/2018, Hospital admission.	★★
P-667.	ZAK_NY 019334, CC, 10/25/2018, OP report.	★★
P-668.	ZAK_NY 017502, CC, 11/23/2018, Procedure report: tube stitch.	★★
P-669.	ZAK_NY 017605–6, CC, 12/23/2018–12/24/2018, ER visit: rigors and fevers.	★★
P-670.	ZAK_NY 019338, CC, 12/26/2018, Procedure report: PICC line insertion for first dose of Ertapenem.	★★
P-671.	ZAK_NY 019341–3, CC, 1/18/2019, OP report: exchange of bilateral biliary drainage catheter.	★★
P-672.	ZAK_NY 019349–51, CC, 1/25/2019, Procedure report: biliary tube suturing.	★★
P-673.	ZAK_NY 018232, CC, 4/17/2019, Procedure: biliary tube change & re-stitched.	★★
P-674.	ZAK_NY 018263–5, CC, 4/22/2019, Procedure: biliary tube re-stitched.	★★
P-675.	ZAK_NY 019356–8, CC, 4/23/2019, OP report: cholangiogram and left biliary catheter exchange.	★★
P-676.	ZAK_NY 019362–5, CC, 5/24/2019, OP report: exchange of biliary drainage catheters.	★★
P-677.	ZAK_NY 016062, CC, 5/29/2019, ER visit	★★



P-678.	ZAK_NY 018555, CC, 6/5/2019 or 5/16/2019, Procedure: neck fine needle aspirate.	★★
P-679.	ZAK_NY 018605, CC, 6/24/2019, Procedure: Prolene suture with an air knot replaced at site of left biliary drainage catheter.	★★
P-680.	ZAK_NY 018765, CC, 7/30/2019, Procedure report: Intubation	★★
P-681.	ZAK_NY 018822–3, CC, 7/30/2019, OP report: EGD and banding of large esophageal varices.	★★
P-682.	ZAK_NY 011971, MSK, 9/11/2014, Labs.	★★
P-683.	ZAK_NY 011970, MSK, 9/14/2014, Labs.	★★
P-684.	ZAK_NY 008914, OHSU 4/21/2016, Labs (2).	★★
P-685.	ZAK_NY 011740, MSK, 4/13/2017, Labs (2).	★★
P-686.	ZAK_NY 012077, MSK, 8/29/2016, Consent - Ablation.	★★
P-687.	ZAK_NY 012090, MSK, 8/19/2016, Consent - Biopsy and Ablation.	★★
P-688.	ZAK_NY 012095, MSK, 4/2/2016, Consent - Perihepatic Drain.	★★
P-689.	ZAK_NY 012105–06, MSK, 3/23/2016, Consent for liver procedure and picture of Liver.	★★
P-690.	ZAK_NY 012124–25, MSK, 9/10/2014, Consent - Liver surgery / biopsy, and drawing of liver and ducts.	★★
P-691.	ZAK_NY 012128, MSK, 9/8/2014, Surgery consent - partial bowel and ovary removal.	★★
P-692.	ZAK_NY 012140–42, MSK, 5/3/2017, Progress Note - Oncologist.	★★
P-693.	ZAK_NY 012145–48, MSK, 5/2/2017, Nursing note, dressing changed.	★★
P-694.	ZAK_NY 012157–60, MSK, 5/1/2017, Infectious Disease Consult.	★★
P-695.	ZAK_NY 012175–76, MSK, 4/28/2017, Surgical admission note.	★★
P-696.	ZAK_NY 012180–83, MSK, 4/26/2017, Hepatopancreatobiliary progress note.	★★
P-697.	ZAK_NY 012184–85, MSK, 4/25/2017, IR Progress Note.	★★
P-698.	ZAK_NY 012186–87, MSK, 4/24/2017, Thoracentesis, catheter exchange, catheter placement.	★★
P-699.	ZAK_NY 012188–89, MSK, 4/24/2017, IR Progress Note.	★★
P-700.	ZAK_NY 012192–94, MSK, 4/23/2017, Hepatopancreatobiliary Interventional Radiology - Progress Note.	★★
P-701.	ZAK_NY 012204–09, MSK, 4/21/2017, Abscess catheter exchange, thoracentesis.	★★

P-702.	ZAK_NY 012210-14, MSK, 4/21/2017, Surgery Admit Note.	★★
P-703.	ZAK_NY 012215-17, MSK, 4/21/2017, Hepatopancreatobiliary Surgery - Progress Note.	★★
P-704.	ZAK_NY 012222-33, MSK, 4/13/2017, Thoracentesis, embolization.	★★
P-705.	ZAK_NY 012234-35, MSK, 4/18/2017, Gastrointestinal Surgery - Progress Note.	★★
P-706.	ZAK_NY 012236-38, MSK, 4/18/2017, Gastrointestinal Interventional Radiology Progress Note.	★★
P-707.	ZAK_NY 012239-43, MSK, 4/17/2017, Gastrointestinal Oncology Progress Note.	★★
P-708.	ZAK_NY 012246-47, MSK, 4/17/2017, Gastrointestinal Interventional Radiology Progress Note.	★★
P-709.	ZAK_NY 012248-52, MSK, 4/16/2017, Gastrointestinal Oncology Progress Note - Erika concerns about her liver.	★★
P-710.	ZAK_NY 012253-57, MSK, 4/16/2017, Gastrointestinal Surgery - Progress Note.	★★
P-711.	ZAK_NY 012258-60, MSK, 4/15/2017, Gastrointestinal Oncology Progress Note.	★★
P-712.	ZAK_NY 012261-62, MSK, 4/15/2017, Gastrointestinal Surgery Progress Note.	★★
P-713.	ZAK_NY 012263-64, MSK, 4/15/2017, Gastrointestinal Interventional Radiology Progress Note.	★★
P-714.	ZAK_NY 012265-69, MSK, 4/14/2017, Gastrointestinal Oncology Progress Note - IR procedure yesterday, still anxious. Distended.	★★
P-715.	ZAK_NY 012270-72, MSK, 4/14/2017, Surgical placement of pigtail drain.	★★
P-716.	ZAK_NY 012273-75, MSK, 4/14/2017, IR Progress Note - Pleural effusion after thoracentesis, evaluate for pneumothorax.	★★
P-717.	ZAK_NY 012284-86, MSK, 4/13/2017, Decision to do surgeries post ablation.	★★
P-718.	ZAK_NY 012287-89, MSK, 4/13/2017, Gastrointestinal Interventional Radiology Progress Note.	★★
P-719.	ZAK_NY 012290-92, MSK, 4/12/2017, Rising LFTs.	★★
P-720.	ZAK_NY 012293-300, MSK, 4/12/2017, Gastrointestinal Oncology Progress Note - Erika has substernal chest pain and fluid building in other areas of body.	★★
P-721.	ZAK_NY 012301-02, MSK, 4/12/2017, Gastrointestinal Consult.	★★
P-722.	ZAK_NY 012303-04, MSK, 4/12/2017, Gastrointestinal Surgery Progress Note.	★★

P-723.	ZAK_NY 012305–06, MSK, 4/12/2017, IR Progress Note - Pleural effusion, no flow in left portal vein.	★★
P-724.	ZAK_NY 012307–11, MSK, 4/11/2017, Gastrointestinal Progress Note.	★★
P-725.	ZAK_NY 012312–18, MSK, 4/11/2017, Gastrointestinal Consult.	★★
P-726.	ZAK_NY 012321–25, MSK, 4/10/2017, Gastrointestinal Oncology – Initial Consult - Beginning of symptoms indicating liver injury.	★★
P-727.	ZAK_NY 012327–28, MSK, 3/22/2017, Gastrointestinal Oncology - Adding radioablation surgery.	★★
P-728.	ZAK_NY 012329, MSK, 3/22/2017, Pre-Ablation Testing Visit Sheet.	★★
P-729.	ZAK_NY 012330–32, MSK, 3/22/2017, Sofocleous Consult.	★★
P-730.	ZAK_NY 012333–38, MSK, 3/22/2017, History and Physical - Pre Surgical.	★★
P-731.	ZAK_NY 012339, MSK, 3/22/2017, Gastrointestinal Oncology Visit Sheet.	★★
P-732.	ZAK_NY 012344–45, MSK, 3/22/2017, IR Questionnaire for New Patient.	★★
P-733.	ZAK_NY 012359–60, MSK, 11/30/2016, Sofocleous Follow Up.	★★
P-734.	ZAK_NY 012367–68, MSK, 10/5/2016, Kemeny FUDR note.	★★
P-735.	ZAK_NY 012380–82, MSK, 8/19/2016, IR - Initial Consult.	★★
P-736.	ZAK_NY 012571, MSK, 4/11/2014, Intraoperative note.	★★
P-737.	ZAK_NY 012626–28, MSK, 9/10/2014, Plan for surgery including resection of colon and hepatic pump placement.	★★
P-738.	ZAK_NY 012634, MSK, 9/8/2014, Consent note for Hepatic Artery Infusion Pump and right colectomy.	★★
P-739.	ZAK_NY 012637–41, MSK, 7/30/2014, Dr. Kemeny's initial consult.	★★
P-740.	ZAK_NY 012642–44, MSK, 7/30/2014, Dr. Garcia-Aguilar's second opinion.	★★
P-741.	ZAK_NY 012680–82, MSK, 4/26/2017, DeMatteo Discharge Note.	★★
P-742.	ZAK_NY 012691–93, MSK, 4/18/2017, Gastrointestinal Discharge Document.	★★
P-743.	ZAK_NY 012699–700, MSK, 8/31/2016, Hospital Summary.	★★
P-744.	ZAK_NY 012706–07, MSK, 4/3/2016, Discharge Summary.	★★

P-745.	ZAK_NY 012710–11, MSK, 3/30/2016, Discharge Summary.	★★
P-746.	ZAK_NY 012715–17, MSK, 9/19/2014, Discharge Summary.	★★
P-747.	ZAK_NY 013850–51, MSK, 4/12/2017, Nursing Event Note - Sternal Pain.	★★
P-748.	ZAK_NY 013862–66, MSK, 4/10/2017, Nursing Assessment Post Surgery.	★★
P-749.	ZAK_NY 013869–71, MSK, 4/10/2017, Nursing Discharge Assessment - PACU.	★★
P-750.	ZAK_NY 013872–74, MSK, 4/10/2017, Nursing Admission Assessment - PACU.	★★
P-751.	ZAK_NY 013875, MSK, 4/5/2017, IR Clinic call - Fever and ER note.	★★
P-752.	ZAK_NY 014066, MSK, 9/11/2014, Pre-Procedure Assessment - Left chest wall mediport.	★★
P-753.	ZAK_NY 014198–201, MSK, 4/10/2017, Surgical Care Plan.	★★
P-754.	ZAK_NY 014426–31, MSK, 4/10/2017, IR Procedure Note.	★★
P-755.	ZAK_NY 014463–74, MSK, 4/10/2017, Anesthesia Record.	★★
P-756.	ZAK_NY 014481–84, MSK, 3/22/2017, Anesthesia Perioperative Evaluation.	★★
P-757.	ZAK_NY 014485–88, MSK, 4/10/2017, Anesthesia Perioperative Evaluation.	★★
P-758.	ZAK_NY 014491–96, MSK, 8/29/2016, IR Procedure Notes.	★★
P-759.	ZAK_NY 014526–27, MSK, 3/24/2016, Surgery Operative Report.	★★
P-760.	ZAK_NY 014528–35, MSK, 3/24/2016, Operating Room Record.	★★
P-761.	ZAK_NY 014536, MSK, 3/24/2016, Hepatectomy, ablation, radiofrequency.	★★
P-762.	ZAK_NY 014566–68, MSK, 9/13/2014, Hepatobiliary Operative Report qv	★★
P-763.	ZAK_NY 014569–70, MSK, 9/11/2014, Colorectal Operative Report.	★★
P-764.	ZAK_NY 014571–78, MSK, 9/11/2014, Operating Room Record.	★★
P-765.	ZAK_NY 014579, MSK, 9/11/2014, Operation Note - removing ovaries and colectomy.	★★
P-766.	ZAK_NY 014729–821, MSK, 4/10/2017, OMS Orders.	★★
P-767.	ZAK_NY 014834–35, MSK, 3/22/2017, IR Form.	★★

P-768.	ZAK_NY 014912–13, MSK, 8/19/2016, IR Disposition Form.	★★
P-769.	ZAK_NY 015321, MSK, 4/13/2017, Cytopathology Report - Pleural fluid is not cancerous, but from inflammation.	★★
P-770.	ZAK_NY 015322–23, MSK, 4/10/2017, Surgical pathology Report - Right liver sample has adenocarcinoma, moderately differentiated, morphology compatible with colon primary.	★★
P-771.	ZAK_NY 015324–26, MSK, 5/5/2017, Diagnostic interpretation of Cancer.	★★
P-772.	ZAK_NY 015333–35, MSK, 3/24/2016, Procurement of Liver Specimens.	★★
P-773.	ZAK_NY 015336–41, MSK, 9/11/2014, Biopsy Summary.	★★
P-774.	ZAK_NY 015345–46, MSK, 7/28/2014, Cecum biopsy with somatic alterations panel.	★★
P-775.	ZAK_NY 015347, MSK, 7/23/2014, Cecum biopsy has infiltrating adenocarcinoma.	★★
P-776.	ZAK_NY 015348–9, MSK, 7/17/2014, Liver biopsy with diagnosis of metastatic adenocarcinoma.	★★
P-777.	ZAK_NY 015450–51, MSK, 4/21/2017, CT Abdomen - new small ascities.	★★
P-778.	ZAK_NY 015458–59, MSK, 4/21/2017, Drainage of right pleural fluid.	★★
P-779.	ZAK_NY 015460–61, MSK, 4/21/2017, IR abscess catheter exchange.	★★
P-780.	ZAK_NY 015462–63, MSK, 4/21/2017, Drained right upper quadrant.	★★
P-781.	ZAK_NY 015470–71, MSK, 4/14/2017, Chest X-Ray - dec opacity on right.	★★
P-782.	ZAK_NY 015472–73, MSK, 4/14/2017, IR abscess catheter placement, biloma.	★★
P-783.	ZAK_NY 015476–78, MSK, 4/13/2017, CT shows no vis of left portal vein, thrombosed, fluid and extravasation.	★★
P-784.	ZAK_NY 015479–80, MSK, 4/13/2017, IR Diagnostic Arteriogram Report - Areas of bleeding, arterial stenoses, they did arteriotomy.	★★
P-785.	ZAK_NY 015481–82, MSK, 4/13/2017, Drain effusion and leave in drain.	★★
P-786.	ZAK_NY 015483–84, MSK, 4/12/2017, Chest X-Ray - small right pleural effusion, focal opacity in left lower lobe.	★★

P-787.	ZAK_NY 015485–86, MSK, 4/12/2017, Chest CT - new focal infection / inflammation in left lower lobe, pleural infusion, new perihepatic ascites.	★★
P-788.	ZAK_NY 015487–88, MSK, 4/11/2017, Ultrasound - no left portal vein perfusion.	★★
P-789.	ZAK_NY 015489–91, MSK, 4/10/2017, PET during surgery.	★★
P-790.	ZAK_NY 015492–93, MSK, 4/10/2017, Ablation technique.	★★
P-791.	ZAK_NY 015496–98, MSK, 3/21/2017, CT Abdomen - hepatic metastases, very subtle.	★★
P-792.	ZAK_NY 015499–501, MSK, 3/21/2017, PET - New seg 7 and 4 lesions, suspicious.	★★
P-793.	ZAK_NY 015530–31, MSK, 8/29/2016, PET - Successful ablation of segment.	★★
P-794.	ZAK_NY 015532–33, MSK, 8/29/2016, PET Results of tumor size.	★★
P-795.	ZAK_NY 015540–41, MSK, 8/16/2016, CT Abdomen - potentially new metastasis.	★★
P-796.	ZAK_NY 015542–44, MSK, 8/16/2016, MRI - viable metastasis.	★★
P-797.	ZAK_NY 015552–53, MSK, 4/2/2016, MRI - successful drainage of abscess.	★★
P-798.	ZAK_NY 015554–55, MSK, 4/1/2016, CT Abdomen - no new hepatic lesions.	★★
P-799.	ZAK_NY 015557–59, MSK, 3/21/2016, MRI - new or re-emergent metastasis.	★★
P-800.	ZAK_NY 015584–85, MSK, 7/21/2015, CT - decreasing size of hepatic metastases.	★★
P-801.	ZAK_NY 015615–16, MSK, 9/16/2014, Hepatic pump working.	★★
P-802.	ZAK_NY 015621–22, MSK, 7/30/2014, Chest CT - shows stable hepatic metastases.	★★
P-803.	ZAK_NY 015638–41, MSK, 4/29/2017, Continual pain.	★★
P-804.	ZAK_NY 015642–47, MSK, 4/28/2017, Urgent Care 2 days after discharge.	★★
P-805.	ZAK_NY 015654, MSK, 4/28/2017, DeMatteo's referral to urgent care.	★★
P-806.	ZAK_NY 015658–60, MSK, 4/21/2017, UCC visit – fever and worsening right flank pain	★★
P-807.	ZAK_NY 015667, MSK, 4/21/2017, Kemeny refers pt to urgent care.	★★
P-808.	ZAK_NY 015715–23, CC, 12/18/2017, Liver Hepatologist - Introductory Visit.	★★

P-809.	ZAK_NY 015732-40, CC, 12/19/2017, Transplant Doctor Consult.	★★
P-810.	ZAK_NY 015771-84, CC, 12/20/2017, Transplant Board Note.	★★
P-811.	ZAK_NY 015806-12, CC, 12/21/2017, Cleveland Oncologist Review.	★★
P-812.	ZAK_NY 015837-74, CC, 2/2/2018, Not able to do living transplant.	★★
P-813.	ZAK_NY 015888-912, CC, 6/12/2018, Perc Image Guided Cholangiography.	★★
P-814.	ZAK_NY 015913-91, CC, 7/31/2018, Fever and chills, blood infusion.	★★
P-815.	ZAK_NY 016089-93, CC, 8/1/2019, Paracentesis for Ascites.	★★
P-816.	ZAK_NY 016094-115, CC, 8/22/2019, Anesthesia Note during Transplant and death.	★★
P-817.	ZAK_NY 016116-18, CC, 8/22/2019, Consent for Liver Transplant.	★★
P-818.	ZAK_NY 016160-86, CC, 6/7/2018, Transplant - Office Visit.	★★
P-819.	ZAK_NY 016201-05, CC, 6/7/2018, Social Worker Note.	★★
P-820.	ZAK_NY 016211-12, CC, 6/10/2018, Erika vomiting.	★★
P-821.	ZAK_NY 016325-37, CC, 7/3/2018, Pain Mgmt - Office Visit.	★★
P-822.	ZAK_NY 016396-401, CC, 7/19/2018, Palliative Care - Office Visit.	★★
P-823.	ZAK_NY 016426-37, CC, 7/31/2018, ER for Fever, receives transfusion (pt 1).	★★
P-824.	ZAK_NY 016652-53, CC, 7/31/2018, Erika note to doctors about quality of life.	★★
P-825.	ZAK_NY 016689-90, CC, 8/12/2018, Biliary Drains not functioning.	★★
P-826.	ZAK_NY 016713-14, CC, 8/20/2018, Diarrhea from new medication.	★★
P-827.	ZAK_NY 016724-45, CC, 8/28/2018, ER - Biliary drain leaking.	★★
P-828.	ZAK_NY 016860-94, CC, 9/27/2018, ER - Fever, Esophagogastroduodenoscopy (pt 1).	★★
P-829.	ZAK_NY 017189-90, CC, 10/10/2018, Question - Ankle and Feet Swelling.	★★
P-830.	ZAK_NY 017216-17, CC, 10/16/2018, Question - Clotting Issue.	★★
P-831.	ZAK_NY 017244-76, CC, 10/25/2018, Biliary Drain Exchange (pt 1).	★★



P-832.	ZAK_NY 017388–89, CC, 10/25/2018, Tumor Board wants a rib lesion biopsy.	★★
P-833.	ZAK_NY 017462–65, CC, 11/7/2018, Rib Biopsy.	★★
P-834.	ZAK_NY 017475–76, CC, 11/12/2018, Food coming out straight into a bili tube.	★★
P-835.	ZAK_NY 017596–739, CC, 12/23/2018, ER - fever.	★★
P-836.	ZAK_NY 017848–89, CC, 1/18/2019, Biliary Drainage w/cholangiography.	★★
P-837.	ZAK_NY 017951–54, CC, 1/25/2019, Social Work Note	★★
P-838.	ZAK_NY 017999–8000, CC, 2/25/2019, Food coming out of drains.	★★
P-839.	ZAK_NY 018003–05, CC, 2/26/2019, Draining food and medications.	★★
P-840.	ZAK_NY 018150–85, CC, 4/4/2019, Biliary Drain Exchange.	★★
P-841.	ZAK_NY 018276–314, CC, 4/23/2019, Biliary Drainage Catheter Exchange.	★★
P-842.	ZAK_NY 018547–56, CC, 6/5/2019, Consult for left neck adenopathy (benign).	★★
P-843.	ZAK_NY 019352–55, CC, 4/4/2019, Biliary Drain Catheter Exchange (right).	★★
P-844.	ZAK_NY 018454–93, CC, 5/24/2019, Biliary Drain Exchange.	★★
P-845.	ZAK_NY 018547, CC, 6/5/2019, Consult.	★★
P-846.	ZAK_NY 018589–92, CC, 6/10/2019, History of surgeries.	★★ Hearsay within hearsay and unreliable Prejudicial
P-847.	ZAK_NY 018718–22, CC, 7/30/2019, ER for hematemesis and bloody output (pt 1).	★★
P-848.	ZAK_NY 019119–276, CC, 8/22/2019, Transplant and Death.	★★
P-849.	ZAK_NY 019281–82, CC, 8/22/2019, Liver offer.	★★
P-850.	ZAK_NY 019283–89, CC, 8/26/2019, Scott wanted to know details of passing.	★★
P-851.	ZAK_NY 019376–81, CC, 7/17/2018, Clotting Problems - Finger won't stop bleeding.	★★
P-852.	ZAK_NY 019384–87, CC, 7/30/2018, Bleeding back wound, can't clot anymore.	★★
P-853.	00125–00126, UCSF, 6/2/2014, Clinic Note, PMS2 deletion from 4/10/2014 biopsy.	★★
P-854.	00439–43, UCSF, 4/23/2014, Progress Note, Notes PMS2 deletion.	★★



P-855.	00522–23, UCSF, 1/7/2015, Progress Note, HAI FUDR well-tolerated, most recent LFTs are normalizing.	★★
P-856.	00536–37, UCSF, 2/5/2015, Progress Note HAI FUDR well-tolerated, LFTs have normalized nicely.	★★
P-857.	00552–53, UCSF, 3/5/2015, Progress note, HAI FUDR well- tolerated, LFTs have normalized nicely with minimally elevated alk phos.	★★
P-858.	03/20/2016 CT C-Abd-Pel W-Contrast	★★
P-859.	04/01/2016 Ct Ab-Pel W-Contrast	★★
P-860.	06/21/2016 Ct Ch-Ab-Pel W-Contrast	★★
P-861.	08/16/2016 Nm Pet Scan	★★
P-862.	11/29/2016 Ct Ch-Abd-Pel W-Contrast	★★
P-863.	11/29/2016 Ch-Abd-Pel W-Contrast	★★
P-864.	08/29/2016 Ir Ablation Liver Pet	★★
P-865.	03/21/2017 CT Abdomen Pelvis with Contrast	★★
P-866.	03/21/2017 Nm Pet Scan	★★
P-867.	04/10/2017 Ir Ablation Liver Pet	★★
P-868.	04/10/2017 NM PET/CT IR	★★
P-869.	04/11/2017 Ultrasound ablation	★★
P-870.	04/12/2017 Chest Xray	★★
P-871.	04/12/2017 CT CHEST R/O PE	★★
P-872.	04/13/2017 CT Abdomen W Liver Triphasic W-Wo Contrast	★★
P-873.	04/13/2017 Hepatic Angiogram	★★
P-874.	04/13/2017 Post Procedure Chest	★★
P-875.	04/13/2017 Ct Abdomen W Liver	★★
P-876.	04/21/2017 Post Procedure Chest	★★
P-877.	05/18/2017 MRCP	★★
P-878.	05/18/2017 MRI	★★
P-879.	05/28/2017 Ct Abdomen & Pelvis W Contrast	★★
P-880.	06/01/2017 Pr Chest	★★
P-881.	06/06/2017 Percutaneous Cholangiogram	★★
P-882.	07/04/2017 Ir Angiogram	★★
P-883.	07/04/2017 CTa Abdomen	★★
P-884.	07/06/2017 Ir Drain Procedure Xray	★★
P-885.	7/27/2017 Forfile CT Abd And-Or Pel - Cd	★★
P-886.	08/14/2017 Forfile Chest	★★
P-887.	08/18/2017 Ir Drain Procedure	★★
P-888.	09/01/2017 CT\SR	★★
P-889.	09/05/2017 Ir Drain Procedure	★★

P-890.	09/15/2017 Ir Drain Procedure	★★
P-891.	09/21/2017 Ir Drain Procedure	★★
P-892.	11/15/2017 Ir Drain Procedure	★★
P-893.	12/11/2017 Ir Drain Procedure	★★
P-894.	12/16/2017 Chest 2 Views	★★
P-895.	02/05/2018 Ir Drain Procedure	★★
P-896.	02/05/2018 Chest 2 Views	★★
P-897.	02/26/2018 Ir Drain Procedure	★★
P-898.	04/02/2018 Ir Drain Procedure	★★
P-899.	5/27/2018 Abdomen 1 View	★★
P-900.	05/27/2018 Ir Drain Procedure	★★
P-901.	05/27/2018 Ir Perc Chol Existing Access	★★
P-902.	05/27/2018 Xr Chest 2V Frontal-Lat	★★
P-903.	6/12/2018 Ir Perc Chole Existing Access	★★
P-904.	7/31/2018 Chest 2V Frontal-Lat	★★
P-905.	12/14/2018 Ct Volume Measurements	★★
P-906.	01/18/2019 Ir Exchange Cath Bili Drain	★★
P-907.	03/01/2019 Xr Chest 2V Frontal-Lat	★★
P-908.	04/04/2019 Ir Exchange Cath Bili Drain	★★
P-909.	04/23/2019 Ir Exchange Cath Bili Drain	★★
P-910.	04/23/2019 Ir Perc Chol Existing Access	★★
P-911.	5/24/2019 Ir Exchange Cath Bili Drain	★★
P-912.	7/15/2019 Ir Perc Chole Existing Access	★★
P-913.	07/30/2019 Xr Abdomen 1V Supine	★★
P-914.	08/01/2019 Xr Abdomen 1V Supine	★★
P-915.	A Rule 1006 summary of hospitalization, surgeries, and procedures, with supporting document referencing the medical record.	Reserve right to object upon receipt
P-916.	A Rule 1006 summary of lab values, with supporting documents referencing the medical record	Reserve right to object upon receipt
P-917.	A Rule 1006 summary of medical billing.	Reserve right to object upon receipt
P-918.	A Rule 1006 summary of expenses.	Reserve right to object upon receipt
P-919.	A Rule 1006 summary of pre-death loss of wages and benefits.	Reserve right to object upon receipt
P-920.	A Rule 1006 summary of post-death loss of wages and benefits.	Reserve right to object upon receipt
P-921.	A Rule 1006 summary of economic losses as calculated by Dr. Smith.	Cumulative Prejudicial

P-922.	A Rule 1006 summary of Dr. Ronald DeMatteo's opinions as included on page 17 of his report.	Cumulative Prejudicial
P-923.	Declaration of Nicholas Katrana with incident data "Exhibit A."	Paragraph 5 of Declaration – excluded per Court's MIL Decision (Doc.. 409, No. 1b)
P-924.	3ps_Powers_099–0100; Probe Manual.	Irrelevant (standard of care) <u>see</u> Court's MIL Decision (Doc. 409, No. 1)
P-925.	3PS_Powers_0001 - 3PS_Powers_0098; NeuWave Manual.	Irrelevant (standard of care and spoliation) <u>see</u> Court's MIL Decision (Doc. 409, No. 1)
P-926.	Audio 1, Sofocleous and Erika Zak, March 22, 2017.	★★
P-927.	Corrected Transcript of Audio 1, Sofocleous and Erika Zak, March 22, 2017.	★★
P-928.	Audio 5, Dr. Kemeny and Erika Zak, January 25, 2017	★★
P-929.	Transcript of Audio 5, Dr. Nancy Kemeny and Erika Zak, Jan. 25, 2017	★★
P-930.	UnitedHealthcare Services medical lien letter, May 17, 2021.	Irrelevant Misleading Prejudicial
P-931.	<i>Rectal Cancer Disappears After Experimental Use of Immunotherapy</i> , MEMORIAL SLOAN KETTERING CANCER CENTER (June 5, 2022).	★ Irrelevant Misleading Prejudicial
P-932.	<i>2-Probe Microwave Ablation</i> , University of Wisconsin School of Medicine and Public Health, Department of Radiology, Tumor Ablation Laboratory (April 10, 2014), <a href="https://www.youtube.com/watch?v=loEf7Wi8ZqY">https://www.youtube.com/watch?v=loEf7Wi8ZqY</a> .	Hearsay Irrelevant Misleading Prejudicial
P-933.	<i>2-Probe Microwave Ablation with Infrared Overlay</i> , University of Wisconsin School of Medicine and Public Health, Department of Radiology, Tumor Ablation Laboratory (April 10, 2014), <a href="https://www.youtube.com/watch?v=yOM5JYPEILA">https://www.youtube.com/watch?v=yOM5JYPEILA</a> .	Hearsay Irrelevant Misleading Prejudicial
P-934.	<i>NEUWAVE™ Microwave Ablation vs. Radiofrequency Ablation</i> , Ethicon (March 11, 2019), <a href="https://www.youtube.com/watch?v=-II7AE1NoM0">https://www.youtube.com/watch?v=-II7AE1NoM0</a> .	Hearsay Irrelevant Misleading Prejudicial

P-935.	Erika Zak, <i>Erika Zak: A posthumous letter to my daughter</i> , Washington Post (Sep. 18, 2019).	Excluded as hearsay see Court's MIL Order (Doc. 407, No. 7)
P-936.	<i>6 Myths about Chemotherapy</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/news/6-myths-about-chemotherapy">https://www.mskcc.org/news/6-myths-about-chemotherapy</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-937.	<i>About Diagnosis &amp; Treatment</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/diagnosis-treatment#:~:text=Call%20833%2D686%2D5740%20or,can%20help%20answer%20your%20questions.&amp;text=Cancer%20diagnosis%20and%20treatment%20at,radiation%20therapy%2C%20and%20symptom%20management">https://www.mskcc.org/cancer-care/diagnosis-treatment#:~:text=Call%20833%2D686%2D5740%20or,can%20help%20answer%20your%20questions.&amp;text=Cancer%20diagnosis%20and%20treatment%20at,radiation%20therapy%2C%20and%20symptom%20management</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-938.	<i>About Your Liver Infusion Pump</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/patient-education/about-your-liver-infusion-pump">https://www.mskcc.org/cancer-care/patient-education/about-your-liver-infusion-pump</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-939.	<i>Cancer Clinical Trials</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/clinical-trials">https://www.mskcc.org/cancer-care/clinical-trials</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-940.	<i>Chemotherapy</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/chemotherapy">https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/chemotherapy</a> ,	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-941.	<i>Colon Cancer</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/types/colon#:~:text=Call%20833%2D686%2D5740%20or,can%20help%20answer%20your%20questions">https://www.mskcc.org/cancer-care/types/colon#:~:text=Call%20833%2D686%2D5740%20or,can%20help%20answer%20your%20questions</a> .	★ Hearsay Irrelevant Misleading

		Improper use of impeachment material
P-942.	<i>Constantinos T. Sofocleous, MD, PhD</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/doctors/constantinos-sofocleous">https://www.mskcc.org/cancer-care/doctors/constantinos-sofocleous</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-943.	<i>Hepatic Arterial Infusion Converts “Unresectable” Colorectal Liver Mets</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/clinical-updates/hepatic-arterial-infusion-converts-unresectable-colorectal-liver-mets">https://www.mskcc.org/clinical-updates/hepatic-arterial-infusion-converts-unresectable-colorectal-liver-mets</a>	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-944.	<i>History &amp; Milestones</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/about/history-milestones">https://www.mskcc.org/about/history-milestones</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-945.	<i>Immunotherapy Cancer Treatment</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/immunotherapy">https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/immunotherapy</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-946.	<i>Interventional Radiology</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/interventional-radiology">https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/interventional-radiology</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-947.	<i>Jennifer’s Story</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/experience/hear-from-patients/jennifer">https://www.mskcc.org/experience/hear-from-patients/jennifer</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material

P-948.	<i>Memorial Sloan Kettering Cancer Center</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/">https://www.mskcc.org/</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-949.	<i>Nancy E. Kemeny, MD</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/doctors/nancy-kemeny">https://www.mskcc.org/cancer-care/doctors/nancy-kemeny</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-950.	<i>Radiation Therapy for Cancer</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/radiation-therapy#:~:text=Call%20833%2D686%2D5740%20or,can%20help%20answer%20your%20questions.&amp;text=Radiation%20oncologist%20Kathryn%20Beal%20specializes,primary%20and%20metastatic%20brain%20tumors..">https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments/radiation-therapy#:~:text=Call%20833%2D686%2D5740%20or,can%20help%20answer%20your%20questions.&amp;text=Radiation%20oncologist%20Kathryn%20Beal%20specializes,primary%20and%20metastatic%20brain%20tumors..</a>	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-951.	<i>Types of Cancer Treatment</i> , MEMORIAL SLOAN KETTERING CANCER CENTER, <a href="https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments">https://www.mskcc.org/cancer-care/diagnosis-treatment/cancer-treatments</a> .	★ Hearsay Irrelevant Misleading Improper use of impeachment material
P-952.	<i>What Makes the Knight Cancer Institute Different</i> , OHSU KNIGHT CANCER INSTITUTE, <a href="https://www.ohsu.edu/knight-cancer-institute/what-makes-knight-cancer-institute-different">https://www.ohsu.edu/knight-cancer-institute/what-makes-knight-cancer-institute-different</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-953.	<i>Knight Cancer Institute Mission and Milestones</i> , OHSU KNIGHT CANCER INSTITUTE, <a href="https://www.ohsu.edu/knight-cancer-institute/knight-cancer-institute-mission-and-milestones">https://www.ohsu.edu/knight-cancer-institute/knight-cancer-institute-mission-and-milestones</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-954.	<i>Hepatic Arterial Infusion (HAI)</i> , OHSU KNIGHT CANCER INSTITUTE, <a href="https://www.ohsu.edu/knight-cancer-institute/hepatic-arterial-infusion-hai">https://www.ohsu.edu/knight-cancer-institute/hepatic-arterial-infusion-hai</a> .	Hearsay Irrelevant Misleading

		Improper use of impeachment material
P-955.	<i>Colorectal Cancer Diagnosis and Treatment</i> , OHSU KNIGHT CANCER INSTITUTE, <a href="https://www.ohsu.edu/knight-cancer-institute/colorectal-cancer-diagnosis-and-treatment">https://www.ohsu.edu/knight-cancer-institute/colorectal-cancer-diagnosis-and-treatment</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-956.	<i>Gastrointestinal Cancers Team</i> , OHSU KNIGHT CANCER INSTITUTE, <a href="https://www.ohsu.edu/knight-cancer-institute/gastrointestinal-cancers-team">https://www.ohsu.edu/knight-cancer-institute/gastrointestinal-cancers-team</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-957.	<i>Liver Transplantation</i> , CLEVELAND CLINIC, <a href="https://my.clevelandclinic.org/health/treatments/8111-liver-transplantation#procedure-details">https://my.clevelandclinic.org/health/treatments/8111-liver-transplantation#procedure-details</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-958.	<i>Indications for Transplant</i> , CLEVELAND CLINIC, <a href="https://my.clevelandclinic.org/departments/transplant/programs/liver/indications">https://my.clevelandclinic.org/departments/transplant/programs/liver/indications</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-959.	<i>Overview</i> , CLEVELAND CLINIC, <a href="https://my.clevelandclinic.org/departments/transplant/programs/liver/overview">https://my.clevelandclinic.org/departments/transplant/programs/liver/overview</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-960.	<i>Transplant Team</i> , CLEVELAND CLINIC, <a href="https://my.clevelandclinic.org/departments/transplant/programs/liver/team">https://my.clevelandclinic.org/departments/transplant/programs/liver/team</a> .	Hearsay Irrelevant Misleading Improper use of impeachment material
P-961.	<i>Prof. Constantinos T. Sofocleous, MD, PhD on Medical Education</i> , Video of Presentation at Humanitas University Conference on January 23, 2017, <a href="https://www.youtube.com/watch?v=4dYUQ5fe2jI">https://www.youtube.com/watch?v=4dYUQ5fe2jI</a> .	Cumulative (background) Irrelevant (global education and training, MDTB, Humanitas University and training,



		technology, advice for students) Misleading Prejudicial Improper impeachment material
P-962.	Jennifer Ford, <i>Ablation for Lung Tumors: An Interview With Constantinos T. Sofocleous, MD, PhD</i> , INTERVENTIONAL ONCOLOGY, <a href="https://www.hmpgloballearningnetwork.com/site/iolearning/article/ablation-lung-tumors-interview-constantinos-t-sofocleous-md-phd?key=Constantinos+Sofocleous+and+lung+ablation&amp;elastic%5B0%5D=brand%3A32056">https://www.hmpgloballearningnetwork.com/site/iolearning/article/ablation-lung-tumors-interview-constantinos-t-sofocleous-md-phd?key=Constantinos+Sofocleous+and+lung+ablation&amp;elastic%5B0%5D=brand%3A32056</a> (March 5, 2015) (including video of the interview).	Irrelevant (lung ablation) Misleading Prejudicial Improper impeachment material
P-963.	Erika Zak's Memorial Book (ZAK_NY 020741–59)	Hearsay Cumulative Prejudicial
P-964.	Dr. Skye Mayo's speech from Erika Zak's Memorial (ZAK_NY 020740)	Excluded Rule 403 <u>see</u> Court's MIL Order (Doc. 409, No. 17a)
P-965.	Dr. Skye Mayo's notice of Erika's death to staff (ZAK_NY 020739).	Excluded Rule 403 <u>see</u> Court's MIL Order (Doc. 409, No. 17a)
P-966.	Loie's journal entry to Erika (ZAK_NY 020800–04)	Hearsay Cumulative Prejudicial Not disclosed during discovery
P-967.	<i>Erika Zak</i> , Morgan Love Thomas Collaboration, <a href="https://www.morganlovethomas.com/erikazak">https://www.morganlovethomas.com/erikazak</a>	Hearsay Irrelevant Cumulative Prejudicial Not disclosed during discovery
P-968.	Memorial Sloan Kettering Cancer Center medical billing (4/10/2017 – 12/31/2018) (inpatient, outpatient, physician services) (ZAK_NY 020131–539)	★ Irrelevant (any costs not related to ablation)
P-969.	Cleveland Clinic Foundation medical billing (12/18/2017 – 9/1/2019) (ZAK_NY 019736–55)	★ Irrelevant (any costs not related to ablation)



P-970.	Oregon Health & Science University medical billing (4/10/2017 –9/1/2019) (Defs' Exchange_OHSU Billing_001–144)	★ Irrelevant (any costs not related to ablation)
P-971.	Walgreen Pharmacy billing records (4/10/2017 – 9/1/2019) (Def's Exchange_Walmart Custodian or Records_001–160)	★ Irrelevant (any costs not related to ablation)

Plaintiff Demonstrative Exhibit No.	Title	Objections
PD-1.	An educational model of a liver.	Reserve objections pending receipt and review
PD-2.	An exemplar of NeuWave Medical Certus 140 2.45GHz ablation probe.	Reserve objections pending receipt and review
PD-3.	An exemplar of bags, drainage tubes, syringes, and other equipment similar to that used by Erika Zak to manage her injury post ablation.	Reserve objections pending receipt and review
PD-4.	A set of demonstrative medical illustrations.	Reserve objections pending receipt and review
PD-5.	Medical illustrations of anatomy and radiology education.	Reserve objections pending receipt and review
PD-6.	Medical illustrations of Erika Zak's pre-ablation anatomy and radiology.	Reserve objections pending receipt and review
PD-7.	Medical illustrations of the April 10, 2017 microwave ablation procedure.	Reserve objections pending receipt and review
PD-8.	Medical illustrations of Erika Zak's post-ablation anatomy and radiology.	Reserve objections pending receipt and review
PD-9.	Medical illustrations of Erika's Zak's radiology.	Reserve objections pending receipt and review
PD-10.	Medical illustration of before and after radiological images of Erika Zak's liver.	Reserve objections pending receipt and review
PD-11.	Medical illustrations and images of thermal energy and microwaves.	Reserve objections pending receipt and review

PD-12.	Supporting reconstruction documents and illustrations.	Reserve objections pending receipt and review
PD-13.	Supporting reference documents and illustrations.	Reserve objections pending receipt and review
PD-14.	A set of demonstrative animations of the April 10, 2017 ablation procedure.	Reserve objections pending receipt and review
PD-15.	An animation of Erika's liver anatomy.	Reserve objections pending receipt and review
PD-16.	An animation of the 03/21/2017 CT and PET scans.	Reserve objections pending receipt and review
PD-17.	An animation of lesion proximity to critical structures.	Reserve objections pending receipt and review
PD-18.	An animation of the 04/10/2017 ablation procedure.	Reserve objections pending receipt and review
PD-19.	An animation of the 04/10/2017 PET scans.	Reserve objections pending receipt and review
PD-20.	An animation of the 04/10/2017 ablation data.	Reserve objections pending receipt and review
PD-21.	An animation of the 04/10/2017 CT scans.	Reserve objections pending receipt and review
PD-22.	A visual timeline of relevant events in Erika's medical history.	Reserve objections pending receipt and review
PD-23.	A demonstrative timeline of Erika's hospitalization, surgeries, and procedures.	Reserve objections pending receipt and review
PD-24.	A set of demonstrative summaries of lab values.	Reserve objections pending receipt and review

**Defendants:**

Defendants reserve the right to use radiology marking software of various films in evidence in real time.

<b><u>Exhibit</u></b>	<b><u>Cite</u></b>	<b><u>Description</u></b>	<b><u>Objection</u></b>
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D-1.	MHCAD Patient Portal 001-018	Memorial Patient Portal Messages 9/4/14 - 11/28/17	Lacks authenticity under FRE 901. Inadmissible hearsay under FRE 801/802.
D-2.	Memorial's Patient Appointment List 001-035	Memorial Appointment List 7/17/14 - 7/26/17	Lacks authenticity under FRE 901. Inadmissible hearsay under FRE 801/802.
D-3.	Kemeny Spreadsheet 001-007	Dr. Kemeny Pump Treatment Flow Sheets 9/11/14 - 6/28/17	Lacks authenticity under FRE 901. Inadmissible hearsay under FRE 801/802.
D-4.	MSK Digital Path Image #1	4/10/17 Biopsy – disclosed during expert discovery	Lacks authenticity under FRE 901. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-5.	MSK Digital Path Image #2	4/10/17 Biopsy – disclosed during expert discovery	Lacks authenticity under FRE 901. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-6.	MSK Digital Path Image #3	4/10/17 Biopsy – disclosed during expert discovery	Lacks authenticity under FRE 901. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was

			within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-7.	CC Pathology Re-Cuts	8/22/19 Liver Transplant Surgery	Lack authenticity under FRE 901. Argument on this point is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-8.	CC Digital Path Image of Re-Cut #1	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-9.	CC Digital Path Image of Re-Cut #2	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own

			possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-10.	CC Digital Path Image of Re-Cut #3	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-11.	CC Digital Path Image of Re-Cut #4	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).

D-12.	CC Digital Path Image of Re-Cut #5	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-13.	CC Digital Path Image of Re-Cut #6	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-14.	CC Digital Path Image of Re-Cut #7	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP

			37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-15.	CC Digital Path Image of Re-Cut #8	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-16.	CC Digital Path Image of Re-Cut #9	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants'

			letter to deem these images authentic (Doc 391).
D-17.	CC Digital Path Image of Re-Cut #10	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-18.	CC Digital Path Image of Re-Cut #11	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-19.	CC Digital Path Image of Re-Cut #12	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not



			timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-20.	CC Digital Path Image of Re-Cut #13	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-21.	CC Digital Path Image of Re-Cut #14	8/22/19 Liver Transplant Surgery	Lacks authenticity under FRE 901. Defendants' expert created these images for the purpose of litigation and did not timely produce them as reliance material. Pursuant to FRCP 37(c)(1), Defendants failed to timely disclose this evidence which was within its own possession. Argument

			on both points is more fully provided in response to Defendants' letter to deem these images authentic (Doc 391).
D-22.	Dr. Sadler's Hepatic Arterial Image #1	7/30/2014 Study – timely disclosed to plaintiff during expert discovery and prior to Dr. Sadler's deposition	Lacks authenticity under FRE 901. Defendants' expert created these images for the purposes of litigation and they have never been provided to Plaintiff. Pursuant to FRCP 37(c)(1), Defendants failed to disclose this evidence which was within its own possession.
D-23.	Dr. Sadler's Hepatic Arterial Image #2	7/30/2014 Study – timely disclosed to plaintiff during expert discovery and prior to Dr. Sadler's deposition	Lacks authenticity under FRE 901. Defendants' expert created these images for the purposes of litigation and they have never been provided to Plaintiff. Pursuant to FRCP 37(c)(1), Defendants failed to disclose this evidence which was within its own possession.
D-24.	Dr. Sadler's Hepatic Arterial Image #3	1/24/2017 Study – timely disclosed to plaintiff during expert discovery and prior to Dr. Sadler's deposition	Lacks authenticity under FRE 901. Defendants' expert created these images for the purposes of litigation and they have never been provided to Plaintiff. Pursuant to FRCP 37(c)(1), Defendants failed to disclose this evidence which was within its own possession.

D-25.	NCCN Guidelines Version 2.2017 Panel Members Colon Cancer	Complete Copy and same as plaintiff's exhibit	★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-26.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit B at Metz Deposition	Irrelevant under FRE 401/402.
D-27.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit C1 at Metz Deposition	Includes inadmissible hearsay under FRE 801/802 with regard to statements by Chloe Metz.
D-28.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit C2 at Metz Deposition	Includes inadmissible hearsay under FRE 801/802 with regard to statements by Chloe Metz.
D-29.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit C3 at Metz Deposition	Includes inadmissible hearsay under FRE 801/802 with regard to statements by Chloe Metz.
D-30.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit C4 at Metz Deposition	Includes inadmissible hearsay under FRE 801/802 with regard to statements by Chloe Metz.
D-31.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit C5 at Metz Deposition	Includes inadmissible hearsay under FRE 801/802 with regard to statements by Chloe Metz.
D-32.	3/22/17 Text Messages between Scott Powers and Chloe Metz	Exhibit D at Metz Deposition	Irrelevant under FRE 401/402.
D-33.	3/22/17 Text Messages between Ms. Zak and Chloe Metz	Exhibit F at Metz Deposition	Irrelevant under FRE 401/402.
D-34.	3/22/17 Text Messages between Ms. Zak and Chloe Metz	Exhibit F1 at Metz Deposition	Includes inadmissible hearsay under FRE 801/802.

D-35.	Chloe Metz Email 4/14/14	Exhibit E at Metz Deposition	Includes inadmissible hearsay under FRE 801/802. Irrelevant under FRE 401/402.
D-36.	Anthony Vassallo Email 4/14/14 and Chloe Metz Response	Exhibit I at Metz Deposition	Includes inadmissible hearsay under FRE 801/802. Irrelevant under FRE 401/402.
D-37.	Audio recording from Ms. Zak's 6/2016 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.
D-38.	Transcript of audio recording from Ms. Zak's 6/2016 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.

D-39.	Audio recording #1 of Ms. Zak's 3/22/17 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.
D-40.	Transcript of audio recording #1 of Ms. Zak's 3/22/17 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.
D-41.	Audio recording #2 of Ms. Zak's 3/22/17 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr.

			Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.
D-42.	Transcript of audio recording #2 of Ms. Zak's 3/22/17 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.
D-43.	Audio recording #3 of Ms. Zak's 3/22/17 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because

			Dr. Kemeny will testify in person during the trial.
D-44.	Transcript of audio recording #3 of Ms. Zak's 3/22/17 visit with Dr. Kemeny		The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.
D-45.	ZAK_NY 19435	Dr. DeMatteo Letter 4/12/18 (Dr. Mayo's letter not excluded as plaintiff claims)	This Court excluded Dr. Mayo's statements advocating for insurance coverage on FRE 403 grounds because it was not written in connection with providing treatment. This letter was written for the same purpose and should be excluded on the same ground.
D-46.	ZAK_NY 19436	Dr. Kemeny Letter (Dr. Mayo's letter not excluded as plaintiff claims)	This Court excluded Dr. Mayo's statements advocating for insurance coverage on FRE 403 grounds because it was not written in connection with providing treatment. This letter was written for the same purpose and should be excluded on the same ground.

D-47.	CV of Dr. Sofocleous	reserving right depending on if Court allows CV of plaintiff's experts	Objection to hearsay. FRE 801/802. Pursuant to FRCP 37(c)(1), Defendants failed to disclose this evidence which was within its own possession. Objection as cumulative under FRE 403, as Dr. Sofocleous is not an expert in this case, his full CV is needlessly cumulative.
D-48.	CV of Dr. Kemeny	reserving right depending on if Court allows CV of plaintiff's experts	Objection to hearsay. FRE 801/802. Pursuant to FRCP 37(c)(1), Defendants failed to disclose this evidence which was within its own possession. Objection as cumulative under FRE 403, as Dr. Kemeny is not an expert in this case, her full CV is needlessly cumulative. The evidence should be excluded because, as the Court concluded in Order 409 granting Defendants' Motion in Limine number 7 (Doc. 301), there are no claims asserted against Dr. Kemeny. This evidence will confuse the jury under FRE 403 because Dr. Kemeny's treatment is not at issue. Further, this evidence would be needlessly cumulative under FRE 403 because Dr. Kemeny will testify in person during the trial.



D-49.	CV of Dr. Fischman	reserving right depending on if Court allows CV of plaintiff's experts	★★
D-50.	CV of Dr. Theise	reserving right depending on if Court allows CV of plaintiff's experts	★★
D-51.	CV of Dr. Bernstein	reserving right depending on if Court allows CV of plaintiff's experts	★★
D-52.	CV of Dr. Sadler	reserving right depending on if Court allows CV of plaintiff's experts	★★
D-53.	CV of Dr. Robinson	reserving right depending on if Court allows CV of plaintiff's experts	★★
D-54.	Kataria, S., et al., <i>Spectrum of Morbid Anatomy of Liver in Autopsy Cases</i> . Int. J. Res. Med. Sci.;9(7). (June 6, 2021).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it confuse the issues and mislead the jury under FRE 403.
D-55.	Poulou LS, et al. <i>Percutaneous Microwave Ablation vs Radiofrequency Ablation in the Treatment of Hepatocellular Carcinoma</i> . World. J. Hepatol.;7(8): (May 18, 2015).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-56.	Karanicolas PJ, et al. <i>Long-term Outcomes Following Tumor Ablation for Treatment of</i>		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection

	<i>Bilateral Colorectal Liver Metastases.</i> JAMA Surg.;148(7):597–601. (July 2013).		to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-57.	Boas, F. E., et al. <i>Radioembolization of Colorectal Liver Metastases: Indications, Technique, and Outcomes.</i> J. Nucl. Med.58(Supp.2), 104S–111S. (September 2017).		★ Objection to hearsay as the periodical’s use at trial does not comply with FRE 803 (18).
D-58.	Livraghi T, et al. <i>Complications of Microwave Ablation for Liver Tumors: Results of a Multicenter Study.</i> Cardiovasc. Intervent. Radiol.; 35(4): 868-74. (August 2012).		★ Objection to hearsay to the extent the periodical’s use at trial does not comply with FRE 803 (18).
D-59.	Takahide Nakazawa, et al. <i>Radiofrequency Ablation of Hepatocellular Carcinoma: Correlation Between Local Tumor Progression After Ablation and Ablative Margin,</i> Am. J.Roentgenol.; 188:2, 480-488 (February 2007).		★ Objection to hearsay to the extent the periodical’s use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-60.	de Baere T, et al. <i>Hepatic Malignancies: Percutaneous Radiofrequency</i>		★ Objection to hearsay to the extent the periodical’s use at trial does not comply with FRE 803 (18). Objection

	<i>Ablation during Percutaneous Portal or Hepatic Vein Occlusion.</i> Radiology;248(3) (September 2008).		to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-61.	Snoeren N, et al. <i>Multipolar Radiofrequency Ablation for Colorectal Liver Metastases close to Major Hepatic Vessels.</i> Surgeon;13(2):77-82. (April 2015).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-62.	Urbonas T, et al. <i>Factors Predicting Ablation Site Recurrence following Percutaneous Microwave Ablation of Colorectal Hepatic Metastases.</i> HPB (Oxford): 21(9):1175-1184 (September 2019).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. Further relevance objection under FRE 401/402, this is standard of care evidence that was not available at the time of the ablation procedure. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-63.	Nie X, et al. <i>Numerical Study of the Effect of Blood Vessel on the Microwave Ablation</i>		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).

	<i>Shape</i> . Biomed. Mater. Eng.;26 Suppl 1:S265-70. (2015).		
D-64.	Ringe, K. I., et al. <i>Experimental Evaluation of the Heat Sink Effect in Hepatic Microwave Ablation</i> . PloS one, 10(7), e0134301 (2015).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-65.	Poch FG, et al., <i>The Vascular Cooling Effect in Hepatic Multipolar Radiofrequency Ablation Leads to Incomplete Ablation ex vivo</i> . Int. J. Hyperthermia. 32(7):749-56. (November 2016).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-66.	David S. K. Lu, et al., <i>Effect of Vessel Size on Creation of Hepatic Radiofrequency Lesions in Pigs: Assessment of the "Heat Sink" Effect</i> . Am. J. Roentgenol.;178:1, 47-51 (2002).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-67.	Izaaryene J, et al., <i>Computed Tomography-Guided Microwave Ablation of Perivascular Liver Metastases from Colorectal Cancer: a Study of the Ablation Zone, Feasibility, and</i>		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).

	<i>Safety. Int J Hyperthermia</i> ;38(1):887-899. (2021).		
D-68.	Masaaki Akahane, et al., <i>Complications of Percutaneous Radiofrequency Ablation for Hepato-Cellular Carcinoma: Imaging Spectrum and Management. RadioGraphics</i> ;25(Suppl.1) (October 1, 2005).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-69.	de Baère T, et al., <i>Adverse Events During Radiofrequency Treatment of 582 Hepatic Tumors. Am J Roentgenol</i> .;181(3):695-700. (Sept 2003).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-70.	Imajo K, et al., <i>A review of Conventional and Newer Generation Microwave Ablation Systems for Hepatocellular Carcinoma. J. Med. Ultrason</i> .;47(2):265-277. (2020).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.

D-71.	Correa-Gallego, C., et al., <i>A Retrospective Comparison of Microwave Ablation vs. Radiofrequency Ablation for Colorectal Cancer Hepatic Metastases</i> . Ann. Surg. Oncol.; 21(13): 4278–4283. (December 2014).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. Further relevance objection under FRE 401/402, to the extent this is standard of care evidence that was not available at the time of the ablation procedure. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-72.	Takuma Teratani, T., et al., <i>Radiofrequency Ablation for Hepatocellular Carcinoma in So-Called High-Risk Locations</i> . HEPATOLOGY;43(5). (2006)		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-73.	Pak LM, et al., <i>Prospective Phase II Trial of Combination Hepatic Artery Infusion and Systemic Chemotherapy for Unresectable Colorectal Liver Metastases: Long Term Results and Curative Potential</i> . J. Surg.		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).

	Oncol.;117(4):634-643. (March 2018).		
D-74.	D'Angelica M, et al., <i>Effect on Outcome of Recurrence Patterns after Hepatectomy for Colorectal Metastases</i> . Ann. Surg. Oncol.;18(4):1096-103. (April 2011).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Further relevance objection under FRE 401/402, to the extent that this is presented as standard of care evidence that was not available at the time of the ablation procedure. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-75.	Reccia I, et al., <i>Radiofrequency-Assisted Liver Resection: Technique and Results</i> . Surg. Oncol.;27(3):415-420. (September 2018).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. Further relevance objection under FRE 401/402, to the extent that this is presented as standard of care evidence that was not available at the time of the ablation procedure. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-76.	Akgül, Ö., et al., <i>Role of Surgery in Colorectal Cancer Liver Metastases</i> . World J.		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection

	Gastroenterol.;20(20), 6113-6122. (May 28, 2014).		to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-77.	Creasy, J. M., et al., <i>Actual 10-Year Survival after Hepatic Resection of Colorectal Liver Metastases: What Factors Preclude Cure?</i> Surgery;163(6), 1238–1244. (2018).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection under 403, to the extent the literature discusses survival of patients unlike Erika Zak, it will confuse the issues and mislead the jury.
D-78.	Muaddi H, et al., <i>Safety and Feasibility of Initiating a Hepatic Artery Infusion Pump Chemotherapy Program for Unresectable Colorectal Liver Metastases: A Multicenter, Retrospective Cohort Study.</i> J. Surg. Oncol.;123(1):252-260 (January 2021).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-79.	Hohn D, et al., <i>Biliary Sclerosis in Patients Receiving Hepatic Arterial Infusions of Floxuridine.</i> J. Clin. Oncol.;3(1):98-102. (January 1985).		★ ★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will



			confuse the issues and mislead the jury under FRE 403.
D-80.	Kurilova I, et al., <i>Factors Associated with Local Tumor Control and Complications After Thermal Ablation of Colorectal Cancer Liver Metastases: A 15-year Retrospective Cohort Study.</i> Clin. Colorectal Cancer;20(2):e82-e95. (June 2021).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Further relevance objection under FRE 401/402, to the extent that this is presented as standard of care evidence that was not available at the time of the ablation procedure. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-81.	Doria MI Jr, et al., <i>Liver Pathology following Hepatic Arterial Infusion Chemotherapy: Hepatic Toxicity with FUDR.</i> Cancer. 15;58(4):855-61.(August 1986).		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-82.	D'Angelica MI, et al., <i>Phase II Trial of Hepatic Artery Infusional and Systemic Chemotherapy for Patients with Unresectable Hepatic Metastases from Colorectal Cancer: Conversion to Resection and Long-Term Outcomes.</i> Ann.		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection under 403, to the extent the literature discusses a different treatment protocol than that used in this case it will confuse the issues and mislead the jury.

	Surg.;261(2) (February 2015).		
D-83.	Oberfield RA, et al., <i>Prolonged and Continuous Percutaneous Intra-Arterial Hepatic Infusion Chemotherapy in Advanced Metastatic Liver Adenocarcinoma from Colorectal Primary.</i> Cancer;44(2):414-23. (August 1979).		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-84.	Brown KT, et al., <i>Obstructive Jaundice in Patients Receiving Hepatic Artery Infusional Chemotherapy: Etiology, Treatment Implications, and Complications after Transhepatic Biliary Drainage.</i> J. Vasc. Interv. Radiol.;8(2):229-34. (1997).		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-85.	Shea WJ Jr, et al., <i>Sclerosing Cholangitis Associated with Hepatic Arterial FUDR Chemotherapy: Radiographic-Histologic Correlation.</i> Am. J. Roentgenol.;146(4):717-21. (April 1986).		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will confuse the issues and

			mislead the jury under FRE 403.
D-86.	Brown KT, et al., <i>Obstructive Jaundice in Patients Receiving Hepatic Artery Infusional Chemotherapy: Etiology, Treatment Implications, and Complications after Transhepatic Biliary Drainage</i> . J. Vasc. Interv. Radiol.;8(2):229-34. (1997).		★ This exhibit is duplicative of D-85. Plaintiff proffers the same objections.  Defendants agree to withdraw exhibit D-87.
D-87.	LiverTox: Clinical and Research Information on Drug-Induced Liver Injury. <i>Floxuridine</i> . National Institute of Diabetes and Digestive and Kidney Diseases (Updated February 2, 2018).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-88.	Sandrasegaran K, Alazmi WM, et al., <i>Chemotherapy-Induced Sclerosing Cholangitis</i> . Clin. Radiol.;61(8):670-8. (August 2006).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses a different treatment protocol than that used in this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-89.	Kemeny N, et al., <i>Hepatic Artery Pump Infusion: Toxicity and Results in Patients with Metastatic</i>		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance

	<i>Colorectal Carcinoma</i> . J. Clin. Oncol.;2(6):595-600. (June 1984).		under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will the issues and mislead the jury under FRE 403.
D-90.	Consult QD. <i>First Transplant to Treat Liver Metastases from Colorectal Cancer in the U.S.</i> <a href="https://consultqd.clevelandclinic.org">https://consultqd.clevelandclinic.org</a> (Published January 18 2018).		★ Objection to hearsay, this is not a statement in a learned treatise, periodical, or pamphlet but a news story. The publication cannot be established as a reliable authority, and it does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-91.	Gudnason, H. O. et al. <i>Secondary Sclerosing Cholangitis</i> . Clin. Exp. Gastroenterol.10, 105–111. (2017).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-92.	Samaras, P., et al. <i>Hemorrhage Associated with Hepatic Artery Pseudoaneurysms after Regional Chemotherapy with Floxuridine: Case Report</i> . Int. Semin. Surg. Oncol. ISSO, 5, 17. (2008).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses the use of different equipment than that used in this case. For this reason, it will confuse the issues and

			mislead the jury under FRE 403.
D-93.	Pozniak, et al. Complications of Hepatic Arterial Infusion Chemotherapy. RadioGraphics. Vol. 11, No. 1. Jan. 1991		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature is outdated and discusses a different treatment protocol than that used in this case. For this reason, it will the issues and mislead the jury under FRE 403.
D-94.	Shady W, et al. <i>Percutaneous Microwave versus Radiofrequency Ablation of Colorectal Liver Metastases: Ablation with Clear Margins (A0) Provides the Best Local Tumor Control.</i> J Vasc Interv Radiol. 2018 Feb;29(2):268-275		★ Objection to hearsay as the periodical's use at trial does not comply with FRE 803 (18).
D-95.	Rhaiem R, et al. <i>Microwave Thermoablation of Colorectal Liver Metastases Close to Large Hepatic Vessels Under Pringle Maneuver Minimizes the "Heat Sink Effect".</i> World J Surg. 2020 May;44(5):1595- 1603		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses treatments unrelated to this case. Further relevance objection under FRE 401/402, to the extent that this is presented as standard of care evidence that was not available at the time of

			the ablation procedure. For these reasons, it will confuse the issues and mislead the jury under FRE 403.
D-96.	Cercek A, et al. <i>Assessment of Hepatic Arterial Infusion of Floxuridine in Combination With Systemic Gemcitabine and Oxaliplatin in Patients With Unresectable Intrahepatic Cholangiocarcinoma: A Phase 2 Clinical Trial.</i> JAMA Oncol. 2020 Jan 1;6(1):60-67		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection to relevance under FRE 401/402 as the literature discusses conditions and treatments unrelated to this case. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-97.	Kim KR, et al. <i>Complications of Image-guided Thermal Ablation of Liver and Kidney Neoplasms.</i> Semin Intervent Radiol. 2014 Jun;31(2):138-48		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-98.	Kanat O, et al. What is the potential role of hepatic arterial infusion chemotherapy in the current armamentarium against colorectal cancer. J Gastrointest Oncol. 2012 Jun;3(2):130-8		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-99.	Chiang J, et al. Potential Mechanisms of Vascular Thrombosis after Microwave		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection

	Ablation in an in Vivo Liver. J Vasc Interv Radiol. 2017 Jul;28(7):1053-1058		under FRE 401/402, to the extent that this is presented as standard of care evidence that was not available at the time of the ablation procedure. For this reason, it will confuse the issues and mislead the jury under FRE 403.
D-100.	Ruitrr, et al. Liver Microwave Ablation. European Radiology (2019)		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection under FRE 401/402, to the extent that this is presented as standard of care evidence that was not available at the time of the ablation procedure. Further objection under 403, to the extent the literature discusses different machines then were used in this case. For these reasons, it will confuse the issues and mislead the jury under FRE 403.
D-101.	Winokur, et al. Characterization of In Vivo Ablation Zones. Journal of Vasc and International Radiolgy. Dec. 2014		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18). Objection under 403, to the extent the literature discusses different equipment then were used in this case. For these reasons, it will confuse the issues and mislead the jury under FRE 403.

D-102.	Dollinger, et al. Adverse effects of irreversible electroporation of malignant liver tumors under CT fluroscopic guidance: a single-center experience. Diagn Interv Radiol. 2015 Nov-Dec; 21(6): 471-475		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-103.	J Oncol Pharm Pract. 2023 Feb 23:10781552231158744. doi: 10.1177/10781552231158744. Online ahead of print. Evaluation of biliary toxicity in patients with hepatic artery infusion pumps.  Elijah J(1)(2), Schepers AJ(1)(2), Krauss JC(3), McDevitt RL(1)(2).		★ Objection to hearsay to the extent the periodical's use at trial does not comply with FRE 803 (18).
D-104.	MHCAD Emails 005		★★
D-105.	MHCAD Emails 011-013		★★
D-106.	MHCAD Emails 015-16		★★
D-107.	MHCAD Emails 019-21		★★
D-108.	MHCAD Emails 023-24		★★
D-109.	MHCAD 035-36		★★
D-110.	MHCAD Emails 045		★★
D-111.	MHCAD 049		★★
D-112.	ZAK_NY 19431 Dr. Sofocleous Text Message 5/3/17		★ Objection hearsay.



D-113.	Dr. Sofocleous Text Messages with Dr. Deipolyi 001-31	Redacting "enjoy your vacation" (026), "be back Tuesday" (027), "boarding now" (027 and 028), and "Have a safe fight" (029) per Court's MIL decision	★
D-114.	MHCAD 16-377	Memorial Lab Results 7/30/14 - 5/3/17	★★
D-115.	MHCAD 448-49	Cleveland Clinic Surgical Pathology Report 1/5/18 Procedure	★★
D-116.	MHCAD 450-51	Fax to Cleveland Clinic 12/28/17	★★
D-117.	MHCAD 452-54	Cleveland Clinic Fax 12/27/17	★★
D-118.	MHCAD 455	Letter to Cleveland Clinic 12/27/17	★★
D-119.	MHCAD 456-58	Cleveland Clinic Fax 12/26/17	★★
D-120.	MHCAD 459	Fax to Cleveland Clinic 12/21/17	★★
D-121.	MHCAD 460	Fax to Cleveland Clinic 12/18/17	★★
D-122.	MHCAD 461	Letter to Cleveland Clinic 12/18/17	★★
D-123.	MHCAD 462-64	Cleveland Clinic Fax 12/15/17	★★
D-124.	MHCAD 465-66	Outpatient Orders 11/28/17	★★
D-125.	MHCAD 467-77, 480-505, 509-36, 539-43, 547-603	OHSU Fax to Dr. Kemeny 11/29/17	★★
D-126.	MHCAD 478-79	OHSU CT Multiphase Liver and Pelvis 11/21/17	★★
D-127.	MHCAD 506-08	OHSU IR Drain Procedure 11/15/17	★★
D-128.	MHCAD 537-38	OHSU CTA Chest 11/10/17	★★
D-129.	MHCAD 544-46	OHSU CT Chest Abdomen and Pelvis 11/1/17	★★
D-130.	MHCAD 604-06	OHSU IR Drain Procedure 9/21/17	★★
D-131.	MHCAD 607-08	OHSU CT Chest Abdomen and Pelvis 9/18/17	★★
D-132.	MHCAD 609-11	Outpatient Orders 9/13/17	★★
D-133.	MHCAD 613-14	OHSU IR Drain Procedure 9/5/17	★★
D-134.	MHCAD 615	OHSU Chest X-Ray 9/6/17	★★

D-135.	MHCAD 616-17	OHSU IR Drain Procedure 9/5/17	★★
D-136.	MHCAD 618-19	OHSU CT Liver and Pelvis 9/1/17	★★
D-137.	MHCAD 620-21	OHSU CT Abdomen and Pelvis 9/1/17	★★
D-138.	MHCAD 622	Outpatient Orders 8/29/17	★★
D-139.	MHCAD 624	Outpatient Orders 8/24/17	★★
D-140.	MHCAD 626	Outpatient Orders 8/21/17	★★
D-141.	MHCAD 628-29	OHSU CT Chest Abdomen and Pelvis 8/17/17	★★
D-142.	MHCAD 630-34	OHSU Fax 8/16/17	★★
D-143.	MHCAD 635-37	OHSU PET CT 8/7/17	★★
D-144.	MHCAD 641-42	OHSU CT Liver and Pelvis 7/27/17	★★
D-145.	MHCAD 643-44	OHSU US Needle Aspiration 7/28/17	★★
D-146.	MHCAD 645	OHSU US Abdomen 7/27/17	★★
D-147.	MHCAD 646-47	OHSU CT Liver and Pelvis 7/28/17	★★
D-148.	MHCAD 648-652	Information from Mayo to Kemeny	★★
D-149.	MHCAD 653-54	OHSU Fax 7/12/17	★★
D-150.	MHCAD 661	Outpatient Orders 7/10/17	★★
D-151.	MHCAD 663-664	Email chain from Dr. Mayo ending 7/6/17	★★
D-152.	MHCAD 665-66	OHSU IR Drain Procedure 7/6/17	★★
D-153.	MHCAD 667	OHSU X-Ray Abdomen 7/6/17	★★
D-154.	MHCAD 668-70	OHSU IR Angiogram 7/4/17	★★
D-155.	MHCAD 671-72	OHSU CTA Abdomen 7/4/17	★★
D-156.	MHCAD 673-76	Outpatient Orders 6/26/17	★★
D-157.	MHCAD 677-78	OHSU CT Liver and Pelvis 6/26/17	★★
D-158.	MHCAD 681	Outpatient Orders 6/22/17	★★
D-159.	MHCAD 683-84	OHSU MRI Cholangiography	★★
D-160.	MHCAD 685-86	OHSU CT Chest 6/12/17	★★
D-161.	MHCAD 687	Fax to Dr. Lynne Strasfeld 6/8/17	★★
D-162.	MHCAD 688-89	Fax from OHSU 6/6/17	★★
D-163.	MHCAD 690-91	Fax from OHSU 6/7/17	★★
D-164.	MHCAD 692-700	OHSU Fax 6/8/17	★★

D-165.	MHCAD 701, 712	OHSU Fax 6/7/17	★★
D-166.	MHCAD 713, 715	Outpatient Orders 6/1/17	★★
D-167.	MHCAD 719-20	OHSU CT Liver and Pelvis 5/21/17	★★
D-168.	MHCAD 721-22	OHSU MRI Cholangiography 5/18/17	★★
D-169.	MHCAD 723-24	OHSU CT Abdomen and Pelvis 5/17/17	★★
D-170.	MHCAD 725-29	OHSU Fax 5/17/17	★★
D-171.	MHCAD 730-33	VNSNY Certification 5/15/17	★★
D-172.	MHCAD 734-42	OHSU Fax 5/11/17	★★
D-173.	MHCAD 743	OHSU Fax 5/5/17	★★
D-174.	MHCAD 746-49	Dr. Kemeny visit note 5/3/17	★★
D-175.	MHCAD 751-54	Outpatient Nurssing Assessment 5/3/17	★★
D-176.	MHCAD 755-57	Vital Signs 5/3/17	★★
D-177.	MHCAD 758	Medication Administration 5/3/17	★★
D-178.	MHCAD 764-70	Home Medication List 5/3/17	★★
D-179.	MHCAD 771-73	Dr. Kemeny Note to Dr. Lopez 5/3/17	★★
D-180.	MHCAD 774-76	Nursing Encounter 5/3/17	★★
D-181.	MHCAD 777-78	Outpatient Orders 5/3/17	★★
D-182.	MHCAD 779-80	Dr. Kemeny Disposition 5/3/17	★★
D-183.	MHCAD 787-88	Social Work Note 5/2/17	★★
D-184.	MHCAD 789-90	HPB Surgery Note 5/2/17	★★
D-185.	MHCAD 791-94	IR Note 5/2/17	★★
D-186.	MHCAD 796-98	Discharge Summary 5/2/17	★★
D-187.	MHCAD 799-802	Discharge Orders 4/28/17 - 5/2/17	★★
D-188.	MHCAD 804	Case Management 5/2/17	★★
D-189.	MHCAD 805-12	Vital Signs 4/28/17 - 5/2/17	★★
D-190.	MHCAD 813-833	I&O Flowsheets 4/28/17 - 5/2/17	★★
D-191.	MHCAD 834-43	Home Medication List 4/28/17	★★
D-192.	MHCAD 849-51	Nursing Assessment 5/2/17 AM	★★
D-193.	MHCAD 874-77	Outpatient Orders 5/2/17	★★
D-194.	MHCAD 878-905	Orders 4/28/17 - 5/2/17	★★
D-195.	MHCAD 906	Care of Tubes 5/2/17	★★
D-196.	MHCAD 907-08	Medication Review 5/2/17	★★
D-197.	MHCAD 909-12	ID Initial Consult 5/1/17	★★

D-198.	MHCAD 913-14	Massage Therapy Visit 5/1/17	★★
D-199.	MHCAD 915-16	HPB Surgery Note 5/1/17	★★
D-200.	MHCAD 917	IR Note 5/1/17	★★
D-201.	MHCAD 918	Case Management Discharge Plan 5/1/17	★★
D-202.	MHCAD 919	Nursing Telephone Note 5/1/17	★★
D-203.	MHCAD 920-23	Nursing Assessment 5/1/17 AM	★★
D-204.	MHCAD 924-27	Nursing Assessment 5/1/17 PM	★★
D-205.	MHCAD 928	Skin/Wound Learning 5/1/17	★★
D-206.	MHCAD 929-34	Nutrition Initial Assessment 4/30/17	★★
D-207.	MHCAD 934-35	NPB Surgery Note 4/30/17	★★
D-208.	MHCAD 936-41	Home Medication List	★★
D-209.	MHCAD 942-46	Nursing Assessment 4/30/17 PM	★★
D-210.	MHCAD 947-50	Nursing Assessment 4/30/17 AM	★★
D-211.	MHCAD 951	Nursing Event Note 4/30/17	★★
D-212.	MHCAD 952	Medication Teaching 4/30/17	★★
D-213.	MHCAD 953-54	Medication Review 4/30/17	★★
D-214.	MHCAD 955-56	HPB Surgery Note 4/29/17	★★
D-215.	MHCAD 960-65	Initial Nursing Assessment 4/29/17	★★
D-216.	MHCAD 966-70	Nursing Assessment 4/29/17 PM	★★
D-217.	MHCAD 971	Nursing Event Note 4/29/17	★★
D-218.	MHCAD 972-75	UCC Nursing Assessment 4/29/17 AM	★★
D-219.	MHCAD 979-80	HPB Surgery Admission Note 4/28/17	★★
D-220.	MHCAD 983-84	UCC Medication Administration 4/28/17	★★
D-221.	MHCAD 985-89	Medication Administration 4/28/17 - 5/2/17	★★
D-222.	MHCAD 990-96	Home Medication List 5/3/17	★★
D-223.	MHCAD 997-98	Dr. DeMatteo Letter to Dr. Lopez 5/22/17	★★
D-224.	MHCAD 999-1000	Nursing Telephone Note 4/28/17	★★
D-225.	MHCAD 1001-08	Outpatient Orders 4/28/17	★★
D-226.	MHCAD 1009-11	4/28/17 CT chest with CTA, and CT abdomen and Pelvis Report	★★

D-227.	CD MSK Radiology	Accompanying 4/28/17 film	★★
D-228.	MHCAD 1014-18	UCC Physician Note 4/28/17	★★
D-229.	MHCAD 1019-20	UCC Triage Note 4/28/17	★★
D-230.	MHCAD 1021	UCC Disposition Order 4/28/17	★★
D-231.	MHCAD 1024	UCC Nursing Notes 4/28/17 - 4/29/17	★★
D-232.	MHCAD 1026	UCC Notification 4/28/17	★★
D-233.	MHCAD 1027-29	UCC Nursing Assessment 4/28/17 PM	★★
D-234.	MHCAD 1030-31	VNS NY Referral 4/17/17	★★
D-235.	MHCAD 1032-33	Connected Home Health Referral 4/24/17	★★
D-236.	MHCAD 1038-40	NP HPB Surgery Note 4/26/17	★★
D-237.	MHCAD 1041-42	HPB Surgery Note 4/26/17	★★
D-238.	MHCAD 1043-45	Discharge Summary 4/26/17	★★
D-239.	MHCAD 1046-49	Discharge Orders 4/21/17 - 4/26/17	★★
D-240.	MHCAD 1050	Case Management 4/26/17	★★
D-241.	MHCAD 1051-61	Vital Signs 4/21/17	★★
D-242.	MHCAD 1062-90	I&O Flowsheets 4/21-17-4/26/17	★★
D-243.	MHCAD 1091-1100	Home Medication List 4/21/17	★★
D-244.	MHCAD 1108-1110	Nursing Assessment 4/26/17 AM	★★
D-245.	MHCAD 1111-13	Nursing Focused Assessment 4/21/17 - 4/26/17	★★
D-246.	MHCAD 1155-1201	Orders 4/21/17 - 4/26/17	★★
D-247.	MHCAD 1205-06	HPB Surgery Note 4/25/17	★★
D-248.	MHCAD 1207-08	IR Note 4/25/17	★★
D-249.	MHCAD 1209	Case Management 4/25/17	★★
D-250.	MHCAD 1210-12	Nursing Assessment 4/25/17 AM	★★
D-251.	MHCAD 1213-16	Nursing Assessment 4/25/17 PM	★★
D-252.	MHCAD 1224-25	HPB Surgery Note 4/24/17	★★
D-253.	MHCAD 1226-27	IR Note 4/24/17	★★
D-254.	MHCAD 1229	Case Management 4/24/17	★★
D-255.	MHCAD 1230-33	Nursing Assessment 4/24/17 AM	★★
D-256.	MHCAD 1234-36	Nursing Assessment 4/24/17 PM	★★
D-257.	MHCAD 1237	Outpatient Order 4/24/17	★★

D-258.	MHCAD 1246-47	HPB Surgery Note 4/23/17	★★
D-259.	MHCAD 1248-50	IR Note 4/23/17	★★
D-260.	MHCAD 1251-53	Nursing Assessment 4/23/17 PM	★★
D-261.	MHCAD 1254-56	Nursing Assessment 4/23/17 AM	★★
D-262.	MHCAD 1258	Transfusion Administration 4/23/17	★★
D-263.	MHCAD 1259	Initial Nutrition Assessment 4/22/17	★★
D-264.	MHCAD 1260-64	HPB Surgery 4/22/17	★★
D-265.	MHCAD 1265-67	IR Note 4/22/17	★★
D-266.	MHCAD 1269-76	Home Medication List 4/21/17	★★
D-267.	MHCAD 1281-84	Initial Nursing Assessment Post-Surgery 4/22/17	★★
D-268.	MHCAD 1285-87	Nursing Assessment 4/22/17 PM	★★
D-269.	MHCAD 1288-90	Nursing Assessment 4/22/17 AM	★★
D-270.	MHCAD 1307-11	IR Procedure Note 4/21/17	★★
D-271.	MHCAD 1313-17	HPB Surgery Admission Note 4/21/17	★★
D-272.	MHCAD 1318-20	HPB Surgery Note 4/21/17	★★
D-273.	MHCAD 1323	Medication Administration 4/21/17	★★
D-274.	MHCAD 1324-31	Medication Administration 4/21/17 - 4/26/17	★★
D-275.	MHCAD 1335-36	Dr. DeMatteo Letter to Dr. Lopez 5/9/17	★★
D-276.	MHCAD 1338-39	Dr. DeMatteo Email Chain ending 4/25/17	★★
D-277.	MHCAD 1340	Nursing Telephone Note 4/21/17 11:21 AM	★★
D-278.	MHCAD 1341	Nursing Telephone Note 4/21/17 9:33 AM	★★
D-279.	MHCAD 1342-44	Nursing Discharge Assessment - PACU 4/21/17	★★
D-280.	MHCAD 1345-47	Nursing Admission Assessment - PACU 4/21/17	★★
D-281.	MHCAD 1352	PACU Flow Sheet 4/21/17	★★
D-282.	MHCAD 1358-66	Anesthesia Record 4/21/17	★★
D-283.	MHCAD 1369-79	Outpatient Orders 4/21/17	★★
D-284.	MHCAD 1381-82	4/21/17 PA and lateral chest	★★

D-285.	MHCAD 1383-84	4/21/17 CT of abdomen and pelvis	★★
D-286.	CD MSK Radiology	Accompanying 4/21/17 film	★★
D-287.	MHCAD 1389-90	4/21/17 CT and ultrasound-guided right thoracentesis (Diagnostic Radiology)	★★
D-288.	CD MSK Radiology	Accompanying 4/21/17 film	★★
D-289.	MHCAD 1391-92	4/21/17 CT and ultrasound-guided right thoracentesis (Interventional Radiology)	★★
D-290.	MHCAD 1393-94	4/21/17 CT, US, and fluoroscopically-guided exchange of RUQ drain	★★
D-291.	CD MSK Radiology	Accompanying 4/21/17 film	★★
D-292.	MHCAD 1395-96	4/21/17 US and fluoroscopically-guided drainage of RUQ fluid collection	★★
D-293.	CD MSK Radiology	Accompanying 4/21/17 film	★★
D-294.	MHCAD 1397-99	UCC Physician Note 4/21/17	★★
D-295.	MHCAD 1400-01	UCC Triage Note 4/21/17	★★
D-296.	MHCAD 1404	UCC Nursing Notes 4/21/17	★★
D-297.	MHCAD 1406	UCC Notification 4/21/17	★★
D-298.	MHCAD 1407-09	UCC Nursing Assessment 4/21/17	★★
D-299.	MHCAD 1412-15	Outpatient Orders 4/19/17	★★
D-300.	MHCAD 1434-37	GI Oncology Note 4/18/17	★★
D-301.	MHCAD 1438-42	IR Procedure Note 4/14/17	★★
D-302.	MHCAD 1444-48	IR Procedure Note 4/13/17	★★
D-303.	MHCAD 1450-51	HPB Surgery Note 4/18/17	★★
D-304.	MHCAD 1452-54	IR Note 4/18/17	★★
D-305.	MHCAD 1455-57	Discharge Summary 4/18/17	★★
D-306.	MHCAD 1458-60	Discharge Orders 4/10/17 - 4/18/17	★★
D-307.	MHCAD 1461	Case Management 4/18/17	★★
D-308.	MHCAD 1462-79	Vital Signs 4/10/17 - 4/18/17	★★
D-309.	MHCAD 1480-1529	I&O Flowsheets 4/10/17 - 4/18/17	★★
D-310.	MHCAD 1534-40	Home Medication List 4/10/17	★★
D-311.	MHCAD 1547-51	Nursing Assessment 4/18/17 AM	★★
D-312.	MHCAD 1552-54	Nursing Focused Assessment 4/10/17 - 4/18/17	★★



D-313.	MHCAD 1569	Nursing Event Note 4/18/17	★★
D-314.	MHCAD 1651	PACU Flow Sheet 4/10/17	★★
D-315.	MHCAD 1653	PACU Flow Sheet 4/14/17	★★
D-316.	MHCAD 1655	PACU Flow Sheet 4/13/17	★★
D-317.	MHCAD 1657-62	IR Procedure Note 4/10/17	★★
D-318.	MHCAD 1669	Verification Checklist 4/10/17	★★
D-319.	MHCAD 1673-1765	Orders 4/10/17 - 4/18/17	★★
D-320.	MHCAD 1766-67	Labs 4/5/17	★★
D-321.	MHCAD 1777-81	GI Oncology Note 4/17/17	★★
D-322.	MHCAD 1782-83	HPB Surgery Note 4/17/17	★★
D-323.	MHCAD 1784-85	IR Note 4/17/17	★★
D-324.	MHCAD 1786-89	Nursing Assessment 4/17/17 AM	★★
D-325.	MHCAD 1790-93	Nursing Assessment 4/17/17 PM	★★
D-326.	MHCAD 1794-95	WOC Nursing Assessment 4/17/17	★★
D-327.	MHCAD 1797-1801	GI Oncology Note 4/16/17	★★
D-328.	MHCAD 1802-06	HPB Surgery Note 4/16/17	★★
D-329.	MHCAD 1807-11	Nursing Assessment 4/16/17 8:20 PM	★★
D-330.	MHCAD 1812-15	Nursing Assessment 4/16/17 AM	★★
D-331.	MHCAD 1816-20	Nursing Assessment 4/16/17 12:00 PM	★★
D-332.	MHCAD 1821	Nursing Event Note 4/16/17	★★
D-333.	MHCAD 1824-26	GI Oncology Note 4/15/17	★★
D-334.	MHCAD 1827-28	HPB Surgery Note 4/15/17	★★
D-335.	MHCAD 1829-30	IR Note 4/15/17	★★
D-336.	MHCAD 1831-34	Nursing Assessment 4/15/17 AM	★★
D-337.	MHCAD 1835-37	Nursing Assessment 4/15/17 PM	★★
D-338.	MHCAD 1840-44	GI Oncology Note 4/14/17	★★
D-339.	MHCAD 1845-47	HPB Surgery Note 4/14/17	★★
D-340.	MHCAD 1848-50	IR Note 4/14/17	★★
D-341.	MHCAD 1851-54	Initial Nursing Assessment Post-Surgery 4/14/17	★★
D-342.	MHCAD 1855-57	Nursing Assessment 4/14/17 PM	★★
D-343.	MHCAD 1858-62	Nursing Assessment 4/14/17 AM	★★



D-344.	MHCAD 1863-65	Nursing Discharge Assessment - PACU 4/14/17	★★
D-345.	MHCAD 1866-68	Nursing Admission Assessment - PACU 4/14/17	★★
D-346.	MHCAD 1869-76	Anesthesia Record 4/14/17	★★
D-347.	MHCAD 1882-83	4/14/17 Portable AP semierect chest	★★
D-348.	MHCAD 1884-85	4/14/17 US-guided drainage of perihepatic suspected bile leak	★★
D-349.	CD MSK Radiology	Accompanying 4/14/17 film	★★
D-350.	MHCAD 1886	Transfusion Administration 4/14/17	★★
D-351.	MHCAD 1887-94	GI Oncology Note 4/13/17	★★
D-352.	MHCAD 1895	IR Event Note 4/13/17	★★
D-353.	MHCAD 1896-97	HPB Surgery Note 4/13/17	★★
D-354.	MHCAD 1898-1900	IR Note 4/13/17	★★
D-355.	MHCAD 1901-03	Nursing Assessment 4/13/17 AM	★★
D-356.	MHCAD 1904	Nursing Event Note 4/13/17	★★
D-357.	MHCAD 1905-07	Nursing Discharge Assessment - PACU 4/13/17	★★
D-358.	MHCAD 1908-1910	Nursing Admission Assessment - PACU 4/13/17	★★
D-359.	MHCAD 1911-19	Anesthesia Record 4/13/17	★★
D-360.	MHCAD 1922	Cytopathology Report 4/13/17 Procedure	★★
D-361.	MHCAD 1924-25	4/13/17 US-guided right thoracentesis (Diagnostic Radiology)	★★
D-362.	CD MSK Radiology	Accompanying 4/13/17 film	★★
D-363.	MHCAD 1926-28	4/13/17 CT abdomen with triphasic liver	★★
D-364.	CD MSK Radiology	Accompanying 4/13/17 film	★★
D-365.	MHCAD 1929-30	4/13/17 US-guided right thoracentesis (Interventional Radiology)	★★
D-366.	CD MSK Radiology	Accompanying 4/13/17 film	★★
D-367.	MHCAD 1931-32	4/13/17 Visceral angiography and hepatic arteriography	★★
D-368.	CD MSK Radiology	Accompanying 4/13/17 film	★★
D-369.	MHCAD 1937	Medicare Form 4/12/17	
D-370.	MHCAD 1938-40	Initial Nutrition Assessment 4/12/17	★★

D-371.	MHCAD 1941-48	GI Oncology Note 4/12/17	★★
D-372.	MHCAD 1949-50	GE Note 4/12/17	★★
D-373.	MHCAD 1951-52	HPB Surgery Note 4/12/17	★★
D-374.	MHCAD 1953-54	IR Note 4/12/17	★★
D-375.	MHCAD 1957-59	Nursing Assessment 4/12/17 PM	★★
D-376.	MHCAD 1960-63	Nursing Assessment 4/12/17 AM	★★
D-377.	MHCAD 1964-65	Nursing Event Note 4/12/17 5:09 AM	★★
D-378.	MHCAD 1966-67	Nursing Event Note 4/12/17 1:30 AM	★★
D-379.	MHCAD 1970-71	4/12/17 Portable AP semierect chest	★★
D-380.	MHCAD 1972-73	4/12/17 CT chest with CTA	★★
D-381.	CD MSK Radiology	Accompanying 4/12/17 film	★★
D-382.	MHCAD 1974-75	Initial Speech/Swallow - Rehab Note 4/12/17	★★
D-383.	MHCAD 1976-80	GI Oncology Note 4/11/17 AM	★★
D-384.	MHCAD 1981-84	GI Oncology Note 4/11/17 PM	★★
D-385.	MHCAD 1985-87	GE Note 4/11/17	★★
D-386.	MHCAD 1988-89	IR Note 4/11/17	★★
D-387.	MHCAD 1991	Case Management 4/11/17	★★
D-388.	MHCAD 1992-97	Home Medication List 4/10/17	★★
D-389.	MHCAD 1998-2001	Nursing Assessment 4/11/17 PM	★★
D-390.	MHCAD 2002-05	Nusing Assessment 4/11/17 AM	★★
D-391.	MHCAD 2010-11	4/11/17 US RUQ	★★
D-392.	MHCAD 2013-17	GI Oncology Note 4/10/17	★★
D-393.	MHCAD 2018	IR Note 4/10/17	★★
D-394.	MHCAD 2019-33	Medication Administration 4/10/17 - 4/18/17	★★
D-395.	MHCAD 2034	NM Medication Administration 4/10/17	★★
D-396.	MHCAD 2035-37	Medication Reconciliation 4/10/17	★★
D-397.	MHCAD 2038-42	Nursing Assessment Post-Procedure 4/10/17	★★
D-398.	MHCAD 2043	Nursing Event Note 4/10/17 5:35 PM	★★
D-399.	MHCAD 2044	Nursing Event Note 4/10/17 1:50 PM	★★

D-400.	MHCAD 2045-47	Nursing Discharge Assessment - PACU 4/10/17	★★
D-401.	MHCAD 2048-50	Nursing Admission Assessment - PACU 4/10/17	★★
D-402.	MHCAD 2051-62	Anesthesia Record 4/10/17	★★
D-403.	MHCAD 2063-64	Procedure Time-Out 4/10/17	★★
D-404.	MHCAD 2065	Molecular Imaging Order Form 4/10/17	★★
D-405.	MHCAD 2067-68	Surgical Pathology Report 4/10/17 Procedure	★★
D-406.	MHCAD 2069-71	Molecular Pathology Report 4/10/17 Procedure	★★
D-407.	MHCAD 2072	Cytopathology Report 4/10/17 Procedure	★★
D-408.	MHCAD 2073-77	MSK-IMPACT Testing Report 4/10/17 Procedure	★★
D-409.	MHCAD 2081-83	4/10/17 Limited Field of View FDG PET/CT	★★
D-410.	CD MSK Radiology	Accompanying 4/10/17 film	★★
D-411.	MHCAD 2084-85	4/10/17 IR Needle Biopsy Body Liver PET Report	★★
D-412.	MHCAD 2086-87	4/10/17 IR Ablation Liver PET Report	★★
D-413.	MHCAD 2088	Nursing Telephone Call 4/5/17	★★
D-414.	MHCAD 2089	Nursing Telephone Call 4/3/17	★★
D-415.	MHCAD 2090	Nursing Telephone Call 3/30/17	★★
D-416.	MHCAD 2091	Nursing Telephone Call 3/23/17	★★
D-417.	MHCAD 2092	Patient Consent Form 3/22/17	★★
D-418.	MHCAD 2093-94	GI Oncology Dr. Kemeny Visit 3/22/17	★★
D-419.	MHCAD 2095	Pre-Surgical Testing Visit Sheet 3/22/17	★★
D-420.	MHCAD 2096-98	IR Dr. Sofocleous Visit 3/22/17	★★
D-421.	MHCAD 2099-2104	History & Physical Pre-Surgical 3/22/17	★★
D-422.	MHCAD 2105	Medical Oncology Outpatient Visit Sheet 3/22/17	★★
D-423.	MHCAD 2107-09	Outpatient Nursing Assessment 3/22/17	★★
D-424.	MHCAD 2110-11	IR New Visit Questionnaire 3/22/17	★★
D-425.	MHCAD 2113-18	Vital Signs 3/22/17	★★
D-426.	MHCAD 2119	Medication Administration 3/22/17	★★

D-427.	MHCAD 2125-39	Home Medication List 3/22/17	★★
D-428.	MHCAD 2141	Dr. Kemeny Letter to Dr. Lopez 3/22/17	★★
D-429.	MHCAD 2142-43	Dr. Kemeny Fax to Dr. Lopez 4/13/17	★★
D-430.	MHCAD 2144-46	Part 1 Pre-Procedure Nursing 3/22/17	★★
D-431.	MHCAD 2147-50	Anesthesia Perioperative Evaluation 3/22/17 Addendum	★★
D-432.	MHCAD 2151-54	Anesthesia Perioperative Evaluation 3/22/17	★★
D-433.	MHCAD 2155-58	Anesthesia Perioperative Evaluation 3/22/17 Addendum No. 1	★★
D-434.	MHCAD 2159-66	Outpatient Orders 3/22/17	★★
D-435.	MHCAD 2167-68	Solid Tumor GI Medicine Disposition 3/22/17	★★
D-436.	MHCAD 2169-70	IR Disposition 3/22/17	★★
D-437.	MHCAD 2179-81	3/21/17 CT of chest, abdomen, and pelvis	★★
D-438.	CD MSK Radiology	Accompanying 3/21/17 film	★★
D-439.	MHCAD 2182-84	3/21/17 Body FDG PET/CT	★★
D-440.	CD MSK Radiology	Accompanying 3/21/17 film	★★
D-441.	MHCAD 2186	Outpatient Orders 3/15/17	★★
D-442.	MHCAD 2187	Dr. Kemeny Letter to Dr. Lopez 2/21/17	★★
D-443.	MHCAD 2188-90	GI Oncology Dr. Kemeny Visit 1/25/17	★★
D-444.	MHCAD 2191	Medical Oncology Outpatient Visit Sheet 1/25/17	★★
D-445.	MHCAD 2193-95	Outpatient Nursing Assessment 1/25/17	★★
D-446.	MHCAD 2196-98	Vital Signs 1/25/17	★★
D-447.	MHCAD 2199	Medication Administration 1/25/17	★★
D-448.	MHCAD 2205-09	Home Medication List 1/25/17	★★
D-449.	MHCAD 2210-11	Dr. Kemeny Fax to Dr. Lopez 2/7/17	★★
D-450.	MHCAD 2212-13	Nursing Encounter 1/25/17	★★
D-451.	MHCAD 2214-21	Outpatient Orders 1/25/17	★★
D-452.	MHCAD 2222-23	Solid Tumor GI Medicine Disposition 1/25/17	★★
D-453.	MHCAD 2243-44	1/24/17 CT chest, abdomen, and pelvis with triphasic liver	★★

D-454.	CD MSK Radiology	Accompanying 1/24/17 film	★★
D-455.	MHCAD 2245-47	1/24/17 Body FDG PET/CT	★★
D-456.	CD MSK Radiology	Accompanying 1/24/17 film	★★
D-457.	MHCAD 2248-49	1/25/17 MRI of abdomen	★★
D-458.	CD MSK Radiology	Accompanying 1/25/17 film	★★
D-459.	MHCAD 2250-63, 2334-37	OHSU Fax 1/20/17	★★
D-460.	MHCAD 2267-69	GI Oncology Visit 11/30/16	★★
D-461.	MHCAD 2270-71	IR Dr. Sofocleous Visit 11/30/16	★★
D-462.	MHCAD 2272	Medical Oncology Outpatient Visit Sheet 11/30/16	★★
D-463.	MHCAD 2274-76	Outpatient Nursing Assessment 11/30/16	★★
D-464.	MHCAD 2277-79	Vital Signs 11/30/16	★★
D-465.	MHCAD 2280	Medication Administration 11/30/16	★★
D-466.	MHCAD 2294	Dr. Kemeny Letter to Dr. Lopez 11/30/16	★★
D-467.	MHCAD 2295-96	Dr. Cercek Fax to Dr. Lopez 12/7/16	★★
D-468.	MHCAD 2297-98	Outpatient Nursing Encounter 11/30/16	★★
D-469.	MHCAD 2299-2306	Outpatient Orders 11/30/16	★★
D-470.	MHCAD 2309-10	Solid Tumor GI Medicine Disposition 11/30/16	★★
D-471.	MHCAD 2311-12	IR Disposition 11/30/16	★★
D-472.	MHCAD 2316-17	11/30/16 MRI of abdomen	★★
D-473.	CD MSK Radiology	Accompanying 11/30/16 film	★★
D-474.	MHCAD 2324	Outpatient Orders 11/29/16	★★
D-475.	MHCAD 2327-28	11/29/16 CT of chest, abdomen, and pelvis	★★
D-476.	CD MSK Radiology	Accompanying 11/29/16 film	★★
D-477.	MHCAD 2329-31	11/29/16 Body FDG PET/CT	★★
D-478.	MHCAD 2333	Nursing Telephone Call 11/18/16	★★
D-479.	MHCAD 2338	Nursing Telephone Call 10/20/16	★★
D-480.	MHCAD 2339	Outpatient Orders 10/20/16	★★
D-481.	MHCAD 2340-41	GI Oncology Dr. Kemeny Visit 10/5/16	★★
D-482.	MHCAD 2342	Medical Oncology Outpatient Visit Sheet 10/5/16	★★

D-483.	MHCAD 2344-46	Outpatient Nursing Assessment 10/5/16	★★
D-484.	MHCAD 2347-49	Vital Signs 10/5/16	★★
D-485.	MHCAD 2350	Medication Administration 10/5/16	★★
D-486.	MHCAD 2357	Dr. Kemeny Letter to Dr. Lopez 10/5/16	★★
D-487.	MHCAD 2358-59	Dr. Kemeny Fax to Dr. Lopez 10/11/16	★★
D-488.	MHCAD 2360-61	Outpatient Nursing Encounter 10/5/16	★★
D-489.	MHCAD 2362-67	Outpatient Orders 10/5/16	★★
D-490.	MHCAD 2368-69	Solid Tumor GI Medicine Disposition 10/5/16	★★
D-491.	MHCAD 2370, 2390-98, 2401-02, 2407-16	Dr. Lopez fax to Dr. Kemeny 10/5/16	★★
D-492.	MHCAD 2371	Dr. Kemeny Letter to Dr. Lopez 10/5/16	★★
D-493.	MHCAD 2377	Dr. Kemeny Fax to Dr. Lopez 10/4/16	★★
D-494.	MHCAD 2380-82	10/4/16 CT of chest, abdomen, and pelvis	★★
D-495.	CD MSK Radiology	Accompanying 10/4/16 film	★★
D-496.	MHCAD 2383-85	10/4/16 Body FDG PET/CT	★★
D-497.	MHCAD 2388	Nursing Telephone Note 9/27/16	★★
D-498.	MHCAD 2389	Outpatient Orders 9/26/16	★★
D-499.	MHCAD 2399-2400	OHSU Fax 9/23/16	★★
D-500.	MHCAD 2403-06, 2596-98	Protocol Eligibility Checklist 8/19/16	★★
D-501.	MHCAD 2417	Nursing Telephone Call 9/8/16	★★
D-502.	MHCAD 2418	Nursing Telephone Call 9/6/16	★★
D-503.	MHCAD 2419	Outpatient Orders 9/6/16	★★
D-504.	MHCAD 2420-21	Medication Administration Record	★★
D-505.	MHCAD 2422	Patient Consent Form 8/29/16	★★
D-506.	MHCAD 2430-31	Discharge Summary 8/31/16	★★
D-507.	MHCAD 2432-34	Discharge Orders 8/29/16 - 8/31/16	★★
D-508.	MHCAD 2435	Case Management	★★
D-509.	MHCAD 2436-43	Vital Signs 8/29/19 - 8/31/16	★★
D-510.	MHCAD 2444-45	Medication Administration Record 8/29/16	★★

D-511.	MHCAD 2446-53	I&O Flowsheet 8/29/16 - 8/31/16	★★
D-512.	MHCAD 2457	Dr. Kemeny Letter to Dr. Lopez 8/31/16	★★
D-513.	MHCAD 2458-61	Nursing Ongoing Assessment 8/31/16 AM	★★
D-514.	MHCAD 2462-64	Nursing Focused Assessment 8/29/16 - 8/31/16	★★
D-515.	MHCAD 2468	Nursing Event Note 8/31/16	★★
D-516.	MHCAD 2488	PACU Flow Sheet 8/29/16	★★
D-517.	MHCAD 2490-95	IR Procedure Note 8/29/16	★★
D-518.	MHCAD 2498	Verification Checklist 8/29/16	★★
D-519.	MHCAD 2500-20	Orders 8/29/16 - 8/31/16	★★
D-520.	MHCAD 2527-29	GI Oncology Note 8/30/16	★★
D-521.	MHCAD 2531-32	Transthoracic Echocardiography Report 8/30/16	★★
D-522.	MHCAD 2533	Case Management Discharge Plan 8/30/16	★★
D-523.	MHCAD 2534-38	Home Medication List 8/29/16	★★
D-524.	MHCAD 2544-46	Nursing Ongoing Assessment 8/30/16 AM	★★
D-525.	MHCAD 2547-49	Nursing Ongoing Assessment 8/30/16 PM	★★
D-526.	MHCAD 2553-54	Medication Administration 8/29/16 - 8/31/16	★★
D-527.	MHCAD 2559	Dr. Sofocleous Email Chain ending 8/29/16	★★
D-528.	MHCAD 2560-62	Nursing Assessment Post-Procedure 8/29/16	★★
D-529.	MHCAD 2563-65	Nursing Ongoing Assessment 8/29/16 PM	★★
D-530.	MHCAD 2566	Nursing Event Note 8/29/16 4:00 PM	★★
D-531.	MHCAD 2567	Nursing Event Note 8/29/16 10:00 AM	★★
D-532.	MHCAD 2568	Nursing Event Note 8/29/16 3:00 PM	★★
D-533.	MHCAD 2569-71	Nursing Discharge Assessment - PACU 8/29/16	★★
D-534.	MHCAD 2572-74	Nursing Admission Assessment - PACU 8/29/16	★★
D-535.	MHCAD 2575-84	Anesthesia Record 8/29/16	★★
D-536.	MHCAD 2585-86	Procedure Time-Out 8/29/16	★★



D-537.	MHCAD 2590-91	IR Ablation Liver PET Report 8/29/16	★★
D-538.	MHCAD 2592-93	8/29/16 Body FDG PET/CT	★★
D-539.	CD MSK Radiology	Accompanying 8/29/16 film	★★
D-540.	MHCAD 2594	OHSU Fax 8/25/16	★★
D-541.	MHCAD 2595	Outpatient Orders 8/22/16	★★
D-542.	MHCAD 2599	Patient Consent Form 8/19/16	★★
D-543.	MHCAD 2602-04	Initial IR Consult Dr. Sofocleous 8/19/16	★★
D-544.	MHCAD 2605-06	IR New Visit Questionnaire 8/19/16	★★
D-545.	MHCAD 2607-09	Vital Signs 8/19/16	★★
D-546.	MHCAD 2614-16	Part 1 Pre-Procedure Nursing 8/19/16	★★
D-547.	MHCAD 2617	Outpatient Orders 8/19/16	★★
D-548.	MHCAD 2618-19	IR Disposition 8/19/16	★★
D-549.	MHCAD 2620-40	Informed Consent for Clinical Research and Forms 8/19/16	★★
D-550.	MHCAD 2641-42	GI Oncology Dr. Kemeny Visit 8/17/16	★★
D-551.	MHCAD 2643	Medical Oncology Outpatient Visit Sheet 8/17/16	★★
D-552.	MHCAD 2645-47	Outpatient Nursing Assessment 8/17/16	★★
D-553.	MHCAD 2648-50	Vital Signs 8/17/16	★★
D-554.	MHCAD 2651	Medication Administration 8/17/16	★★
D-555.	MHCAD 2657-58	Dr. Kemeny Fax to Dr. Lopez 8/23/16	★★
D-556.	MHCAD 2659-62	Outpatient Nursing Encounter 8/17/16	★★
D-557.	MHCAD 2663-71	Outpatient Orders 8/17/16	★★
D-558.	MHCAD 2672-73	Solid Tumor GI Medicine Disposition 8/17/16	★★
D-559.	MHCAD 2674-75	8/17/16 MRI Brain	★★
D-560.	MHCAD 2691	Dr. Kemeny Fax to Dr. Lopez 8/16/16	★★
D-561.	MHCAD 2696-97	8/16/16 CT of chest, abdomen, and pelvis	★★
D-562.	CD MSK Radiology	Accompanying 8/16/16 film	★★
D-563.	MHCAD 2698-2700	8/17/16 Body FDG PET/CT	★★
D-564.	CD MSK Radiology	Accompanying 8/17/16 film	★★
D-565.	MHCAD 2701-05	OHSU Fax 8/16/16	★★



D-566.	MHCAD 2706-07	GI Oncology Dr. Kemeny Visit 7/20/16	★★
D-567.	MHCAD 2708	Medical Oncology Outpatient Visit Sheet 7/20/16	★★
D-568.	MHCAD 2709-11	Outpatient Nursing Assessment 7/20/16	★★
D-569.	MHCAD 2712-14	Vital Signs 7/20/16	★★
D-570.	MHCAD 2715	Medication Administration 7/20/16	★★
D-571.	MHCAD 2730	Dr. Kemeny Letter to Dr. Lopez 7/20/16	★★
D-572.	MHCAD 2731-32	Dr. Kemeny Fax to Dr. Lopez 7/26/16	★★
D-573.	MHCAD 2733-40	Outpatient Orders 7/20/16	★★
D-574.	MHCAD 2741-42	Solid Tumor GI Medicine Disposition 7/20/16	★★
D-575.	MHCAD 2743-55, 2763-65	Dr. Lopez Fax to Dr. Kemeny 7/19/16	★★
D-576.	MHCAD 2756-62	Dr. Lopez Fax to Dr. Kemeny 6/27/16	★★
D-577.	MHCAD 2766-67	GI Oncology Dr. Kemeny Visit 6/22/16	★★
D-578.	MHCAD 2768	Medical Oncology Outpatient Visit Sheet 6/22/16	★★
D-579.	MHCAD 2770-72	Outpatient Nursing Assessment 6/22/16	★★
D-580.	MHCAD 2773-75	Vital Signs 6/22/16	★★
D-581.	MHCAD 2776	Medication Administration 6/22/16	★★
D-582.	MHCAD 2782	Dr. Kemeny Letter to Dr. Lopez 6/22/16	★★
D-583.	MHCAD 2783-84	Dr. Kemeny Fax to Dr. Lopez 7/1/16	★★
D-584.	MHCAD 2785-90	Outpatient Orders 6/22/16	★★
D-585.	MHCAD 2791-92	Solid Tumor GI Medicine Disposition 6/22/16	★★
D-586.	MHCAD 2803-04	6/21/16 CT of chest, abdomen, and pelvis	★★
D-587.	CD MSK Radiology	Accompanying 6/21/16 film	★★
D-588.	MHCAD 2805-07	6/21/16 Body FDG PET/CT	★★
D-589.	CD MSK Radiology	Accompanying 6/21/16 film	★★
D-590.	MHCAD 2808-18	Dr. Lopez Fax to Dr. Kemeny 6/13/16	★★

D-591.	MHCAD 2819-27, 2838-39	Dr. Lopez Fax to Dr. Kemeny 6/10/16	★★
D-592.	MHCAD 2828-37, 2840-44	Dr. Lopez Fax to Dr. Kemeny 6/3/16	★★
D-593.	MHCAD 2845	Outpatient Orders 5/26/16	★★
D-594.	MHCAD 2846-47	GI Oncology Dr. Kemeny Visit 5/25/16	★★
D-595.	MHCAD 2848	Medical Oncology Outpatient Visit Sheet 5/25/16	★★
D-596.	MHCAD 2850-52	Outpatient Nursing Assessment 5/25/16	★★
D-597.	MHCAD 2853-55	Vital Signs 5/25/16	★★
D-598.	MHCAD 2856-57	Medication Administration 5/25/16	★★
D-599.	MHCAD 2873-74	Dr. Kemeny Fax to Dr. Lopez 6/7/16	★★
D-600.	MHCAD 2875-76	Nursing Encounter 5/25/16	★★
D-601.	MHCAD 2877-83	Outpatient Orders 5/25/16	★★
D-602.	MHCAD 2884-85	Solid Tumor GI Medicine Disposition 5/25/16	★★
D-603.	MHCAD 2886-87	Fax to OHSU 5/18/16	★★
D-604.	MHCAD 2888-2903	Fax from OHSU 5/16/16	★★
D-605.	MHCAD 2904-05	Fax to OHSU 5/10/16	★★
D-606.	MHCAD 2906-07	Fax from OHSU 5/3/16	★★
D-607.	MHCAD 2908-14	Fax from Dr. Mayo to Dr. DeMatteo 5/5/16	★★
D-608.	MHCAD 2915-16	Fax from OHSU 4/29/16	★★
D-609.	MHCAD 2917	Outpatient Orders 4/28/16	★★
D-610.	MHCAD 2918-20	GI Oncology Visit 4/27/16	★★
D-611.	MHCAD 2921	Medical Oncology Outpatient Visit Sheet 4/27/16	★★
D-612.	MHCAD 2923-25	Outpatient Nursing Assessment 4/27/16	★★
D-613.	MHCAD 2926	Vital Signs 4/27/16	★★
D-614.	MHCAD 2929-30	Medication Administration 4/27/16	★★
D-615.	MHCAD 2944	Dr. Kemeny Letter to Dr. Lopez 4/27/16	★★
D-616.	MHCAD 2945-46	Dr. Cercek Fax to Dr. Lopez 5/18/16	★★
D-617.	MHCAD 2947	Nursing Encounter 4/27/16	★★
D-618.	MHCAD 2948-52	Outpatient Orders 4/27/16	★★

D-619.	MHCAD 2953-54	Solid Tumor GI Medicine Disposition 4/27/16	★★
D-620.	MHCAD 2955-56	Fax from OHSU 4/15/16	★★
D-621.	MHCAD 2957-58	Fax from OHSU 4/14/16	★★
D-622.	MHCAD 2959	Letter to OHSU 4/15/16	★★
D-623.	MHCAD 2960-62	GI Oncology Dr. Kemeny Visit 4/6/16	★★
D-624.	MHCAD 2963-64	HPB Surgery Dr. DeMatteo Visit 4/6/16	★★
D-625.	MHCAD 2965	Medical Oncology Outpatient Visit Sheet 4/6/16	★★
D-626.	MHCAD 2967-69	Vital Signs 4/6/16	★★
D-627.	MHCAD 2978-79	Dr. DeMatteo Fax to Dr. Lopez 4/13/16	★★
D-628.	MHCAD 2980-81	Dr. Kemeny Fax to Dr. Lopez 4/11/16	★★
D-629.	MHCAD 2982	Nursing Encounter 4/6/16	★★
D-630.	MHCAD 2983	Outpatient Orders 4/6/16	★★
D-631.	MHCAD 2984-85	Solid Tumor GI Medicine Disposition 4/6/16	★★
D-632.	MHCAD 2986-87	HPB Disposition 4/6/16	★★
D-633.	MHCAD 2988	Outpatient Orders 4/5/16	★★
D-634.	MHCAD 2989-90	IR Telephone Call 4/4/16	★★
D-635.	MHCAD 2991	Nursing Telephone Call 4/4/16	★★
D-636.	MHCAD 2992	Patient Consent 4/2/16	★★
D-637.	MHCAD 2997-3001	IR Procedure Note 4/2/16	★★
D-638.	MHCAD 3002-03	IR Progress Note 4/3/16	★★
D-639.	MHCAD 3004-05	Discharge Summary 4/3/16	★★
D-640.	MHCAD 3006-07	Discharge Orders 4/1/16 - 4/3/16	★★
D-641.	MHCAD 3008-13	Vital Signs 4/1/16 - 4/3/16	★★
D-642.	MHCAD 3014-24	I&O Flowsheets 4/1/16 - 4/3/16	★★
D-643.	MHCAD 3033-35	Nursing Ongoing Assessment 4/3/16 AM	★★
D-644.	MHCAD 3056-73	Orders 4/1/16 - 4/3/16	★★
D-645.	MHCAD 3078-80	Initial Nutrition Assessment 4/2/16	★★
D-646.	MHCAD 3081-83	HPB Note 4/2/16	★★
D-647.	MHCAD 3091-94	Initial Nursing Assessment Post-Procedure 4/2/16	★★
D-648.	MHCAD 3095-99	Initial Nursing Assessment IP 4/2/16	★★

D-649.	MHCAD 3100-03	Nursing Ongoing Assessment 4/2/16 PM	★★
D-650.	MHCAD 3104-06	Nursing Ongoing Assessment 4/2/16 AM	★★
D-651.	MHCAD 3111-12	4/2/16 image-guided drainage of perihepatic suspected image	★★
D-652.	CD MSK Radiology	Accompanying 4/2/16 film	★★
D-653.	MHCAD 3117-19	HPB Surgery Admission Note 4/1/16	★★
D-654.	MHCAD 3122	Medication Administration 4/1/16	★★
D-655.	MHCAD 3123-26	Medication Administration 4/1/16 - 4/3/16	★★
D-656.	MHCAD 3127-28	Dr. DeMatteo Fax to Dr. Lopez 4/18/16	★★
D-657.	MHCAD 3129	Nursing Telephone Call 4/1/16	★★
D-658.	MHCAD 3130-34	Outpatient Orders 4/1/16	★★
D-659.	MHCAD 3137-38	4/1/16 CT of abdomen and pelvis	★★
D-660.	CD MSK Radiology	Accompanying 4/1/16 film	★★
D-661.	MHCAD 3140-42	UCC Physician Note 4/1/16	★★
D-662.	MHCAD 3143-44	UCC Triage Note 4/1/16	★★
D-663.	MHCAD 3145	UCC Disposition Order 4/1/16	★★
D-664.	MHCAD 3148	UCC Nursing Notes 4/1/16	★★
D-665.	MHCAD 3150-52	UCC Nursing Ongoing Assessment 4/1/16 PM	★★
D-666.	MHCAD 3153-55	Protocol Eligibility Checklist 3/23/16	★★
D-667.	MHCAD 3156-57	HPB Surgery Note 3/30/16	★★
D-668.	MHCAD 3158-59	Discharge Summary 3/30/16	★★
D-669.	MHCAD 3160-62	Discharge Orders 3/24/16 - 3/30/16	★★
D-670.	MHCAD 3163-3181, 3216-19	Vital Signs 3/24/16 - 3/30/16	★★
D-671.	MHCAD 3182-85	Medication Administration Record 3/24/16 - 3/25/16	★★
D-672.	MHCAD 3186-3215	I&O Flowsheets 3/24/16 - 3/30/16	★★
D-673.	MHCAD 3227-29	Nursing Ongoing Assessment 3/30/16 AM	★★
D-674.	MHCAD 3281, 3285	PACU Flow Sheet 3/25/16	★★
D-675.	MHCAD 3283	PACU Flow Sheet 3/24/16	★★
D-676.	MHCAD 3288-3336	Orders 3/24/16 - 3/30/16	★★

D-677.	MHCAD 3339-40	PT Note 3/30/16	★★
D-678.	MHCAD 3341-42	Initial Social Work Note 3/29/16	★★
D-679.	MHCAD 3343-44	HPB Surgery Note 3/29/16	★★
D-680.	MHCAD 3345-47	Nursing Ongoing Assessment 3/29/16 PM	★★
D-681.	MHCAD 3348-50	Nursing Ongoing Assessment 3/29/16 AM	★★
D-682.	MHCAD 3352-53	HPB Surgery Note 3/28/16	★★
D-683.	MHCAD 3354-56	Nursing Ongoing Assessment 3/28/16 AM	★★
D-684.	MHCAD 3357-60	Nursing Ongoing Assessment 3/28/16 PM	★★
D-685.	MHCAD 3363-64	HPB Surgery Note 3/27/16	★★
D-686.	MHCAD 3365-68	Nursing Ongoing Assessment 3/27/16 AM	★★
D-687.	MHCAD 3369-71	Nursing Ongoing Assessment 3/27/16 PM	★★
D-688.	MHCAD 3372	Nursing Event Note 3/27/16 AM	★★
D-689.	MHCAD 3373	Nursing Event Note 3/27/16 PM	★★
D-690.	MHCAD 3375-76	HPB Surgery Note 3/26/16	★★
D-691.	MHCAD 3377-79	Nursing Ongoing Assessment 3/26/16 PM	★★
D-692.	MHCAD 3380-83	Nursing Ongoing Assessment 3/26/16 AM	★★
D-693.	MHCAD 3384	Nursing Event Note 3/26/16 AM	★★
D-694.	MHCAD 3385	Nursing Event Note 3/26/16 PM	★★
D-695.	MHCAD 3388-92	Initial PT Evaluation 3/26/16	★★
D-696.	MHCAD 3393-94	Initial Nutrition Assessment 3/25/16	★★
D-697.	MHCAD 3395-96	HPB Surgery Note 3/25/16	★★
D-698.	MHCAD 3403-06	Initial Nursing Assessment Post-Surgery 3/25/16	★★
D-699.	MHCAD 3407-09	Nursing Ongoing Assessment 3/25/16 PM	★★
D-700.	MHCAD 3410	Nursing Event Note 3/25/16 1:14 AM	★★
D-701.	MHCAD 3411-13	Nursing Discharge Assessment - PACU 3/25/16	★★

D-702.	MHCAD 3414-16	Discharge Note - PACU 3/25/16	★★
D-703.	MHCAD 3421-22	Respiratory Therapy Note 3/25/16	★★
D-704.	MHCAD 3424-34	Medication Administration 3/24/16 - 3/30/16	★★
D-705.	MHCAD 3440-41	Dr. DeMatteo Fax to Dr. Lopez 3/29/16	★★
D-706.	MHCAD 3442-43	Dr. DeMatteo Fax to Dr. Lopez 4/13/16	★★
D-707.	MHCAD 3444-52	Pre-Surgery Nursing Assessment 3/24/16	★★
D-708.	MHCAD 3453	Nursing Event Note 3/24/16 11:00 PM	★★
D-709.	MHCAD 3454	Nursing Event Note 3/25/16 12:00 AM	★★
D-710.	MHCAD 3455	Nursing Event Note 3/24/16 10:00 PM	★★
D-711.	MHCAD 3456-59	Nursing Admission Assessment - PACU 3/24/16	★★
D-712.	MHCAD 3460-61	HPB Surgery Operative Report 3/24/16	★★
D-713.	MHCAD 3462-69	Operating Room Record 3/24/16	★★
D-714.	MHCAD 3470	Brief Operative Note 3/24/16	★★
D-715.	MHCAD 3471-81	Anesthesia Record 3/24/16	★★
D-716.	MHCAD 3482-83	Procedure Time-Out 3/24/16	★★
D-717.	MHCAD 3484-86	Surgical Pathology Report 3/24/16 Procedure	★★
D-718.	MHCAD 3487	Patient Consent 3/23/16	★★
D-719.	MHCAD 3489	Pre-Surgical Testing Visit Sheet 3/23/16	★★
D-720.	MHCAD 3490-95	History & Physical Pre-Surgical 3/23/16	★★
D-721.	MHCAD 3496-98	HPB Surgery Dr. DeMatteo Visit 3/23/16	★★
D-722.	MHCAD 3499-3501	Vital Signs 3/23/16	★★
D-723.	MHCAD 3508-09	Dr. DeMatteo Fax to Dr. Lopez 3/25/16	★★
D-724.	MHCAD 3510-12	Part 1 Pre-Procedure Nursing 3/23/16	★★
D-725.	MHCAD 3513-16	Anesthesia Perioperative Evaluation 3/23/16	★★

D-726.	MHCAD 3517-20	Anesthesia Perioperative Evaluation 3/23/16 Addendum No. 1	★★
D-727.	MHCAD 3521-23	Outpatient Orders 3/23/16	★★
D-728.	MHCAD 3524-25	HPB Disposition Form 3/23/16	★★
D-729.	MHCAD 3526-41	Informed Consent for Clinical Research and Forms 3/23/16	★★
D-730.	MHCAD 3542-44	GI Oncology Dr. Kemeny Visit 3/21/16	★★
D-731.	MHCAD 3546	Medical Oncology Outpatient Visit Sheet 3/21/16	★★
D-732.	MHCAD 3547-49	Vital Signs 3/21/16	★★
D-733.	MHCAD 3551-52	Dr. Kemeny Fax to Dr. Lopez 3/22/16	★★
D-734.	MHCAD 3553-54	Solid Tumor GI Medicine Disposition 3/21/16	★★
D-735.	MHCAD 3555-56	HPB Disposition 3/21/16	★★
D-736.	MHCAD 3558-60	3/21/16 Body FDG PET/CT	★★
D-737.	CD MSK Radiology	Accompanying 3/21/16 film	★★
D-738.	MHCAD 3564-66	3/21/16 CT of chest, abdomen, and pelvis	★★
D-739.	CD MSK Radiology	Accompanying 3/21/16 film	★★
D-740.	MHCAD 3569	Nursing Telephone Call 3/17/16	★★
D-741.	MHCAD 3570-73, 3575-83	Dr. Lopez Fax to Dr. Kemeny 3/14/16	★★
D-742.	MHCAD 3574	Outpatient Orders 3/11/16	★★
D-743.	MHCAD 3584-88, 3590-99	Dr. Lopez Fax to Dr. Kemeny 3/1/16	★★
D-744.	MHCAD 3589	Nursing Telephone Call 2/24/16	★★
D-745.	MHCAD 3600-01	GI Oncology Dr. Kemeny Visit 2/22/16	★★
D-746.	MHCAD 3602	Medical Oncology Outpatient Visit Sheet 2/22/16	★★
D-747.	MHCAD 3604-06	Outpatient Nursing Assessment 2/22/16	★★
D-748.	MHCAD 3607-09	Vital Signs 2/22/16	★★
D-749.	MHCAD 3610	Medication Administration 2/22/16	★★
D-750.	MHCAD 3616	Dr. Kemeny Letter to Dr. Lopez 2/22/16	★★
D-751.	MHCAD 3617-18	Dr. Kemeny Fax to Dr. Lopez 2/29/16	★★
D-752.	MHCAD 3630-31	Solid Tumor GI Medicine Disposition 2/22/16	★★



D-753.	MHCAD 3632	Nursing Telephone Call 2/18/16	★★
D-754.	MHCAD 3633-45	Dr. Lopez Fax to Dr. Kemeny 2/22/16	★★
D-755.	MHCAD 3646-50	OHSU Fax 2/11/16	★★
D-756.	MHCAD 3651	Nursing Telephone Call 2/9/16	★★
D-757.	MHCAD 3652-66	Dr. Lopez Fax to Dr. Kemeny 2/1/16	★★
D-758.	MHCAD 3667-68	GI Oncology Dr. Kemeny Visit 1/27/16	★★
D-759.	MHCAD 3669-71	Outpatient Nursing Assessment 1/27/16	★★
D-760.	MHCAD 3672-74	Vital Signs 1/27/16	★★
D-761.	MHCAD 3675	Medication Administration 1/27/16	★★
D-762.	MHCAD 3685-86	Dr. Kemeny Fax to Dr. Lopez 2/2/16	★★
D-763.	MHCAD 3688-94	Outpatient Orders 1/27/16	★★
D-764.	MHCAD 3695-96	Solid Tumor GI Medicine Disposition 1/27/16	★★
D-765.	MHCAD 3697	Dr. Kemeny Letter to Dr. Lopez 1/27/16	★★
D-766.	MHCAD 3706-07	1/26/16 CT of chest, abdomen, and pelvis	★★
D-767.	CD MSK Radiology	Accompanying 1/26/16 film	★★
D-768.	MHCAD 3708	Medical Oncology Outpatient Visit Sheet 1/27/16	★★
D-769.	MHCAD 3709	Dr. Kemeny Letter to Dr. Lopez 1/25/16	★★
D-770.	MHCAD 3710	Outpatient Orders 1/25/16	★★
D-771.	MHCAD 3711-28	Dr. Lopez's Fax to Dr. Kemeny 1/4/16	★★
D-772.	MHCAD 3729-30	GI Oncology Dr. Kemeny Visit 12/21/15	★★
D-773.	MHCAD 3731	Medical Oncology Outpatient Visit Sheet 12/21/15	★★
D-774.	MHCAD 3732-34	Outpatient Nursing Assessment 12/21/15	★★
D-775.	MHCAD 3735-37	Vital Signs 12/21/15	★★
D-776.	MHCAD 3738	Medication Administration 12/21/15	★★
D-777.	MHCAD 3749	Dr. Kemeny Letter to Dr. Lopez 12/21/15	★★
D-778.	MHCAD 3750-51	Dr. Kemeny Fax to Dr. Lopez 12/29/15	★★



D-779.	MHCAD 3752-58	Outpatient Orders 12/21/15	★★
D-780.	MHCAD 3759-60	Solid Tumor GI Medicine Disposition 12/21/15	★★
D-781.	MHCAD 3761	Nursing Telephone Call 12/18/15	★★
D-782.	MHCAD 3762-79, 3878-93	Dr. Lopez Fax to Dr. Kemeny 12/18/15	★★
D-783.	MHCAD 3780-81	GI Oncology Dr. Kemeny Visit 11/18/15	★★
D-784.	MHCAD 3782-83	HPB Surgery Dr. DeMatteo Visit 11/18/15	★★
D-785.	MHCAD 3784	Medical Oncology Outpatient Visit Sheet 11/18/15	★★
D-786.	MHCAD 3785-87	Outpatient Nursing Assessment 11/18/15	★★
D-787.	MHCAD 3788-90	Vital Signs 11/18/15	★★
D-788.	MHCAD 3791	Medication Administration 11/18/15	★★
D-789.	MHCAD 3802	Dr. Kemeny Letter to Dr. Lopez 11/18/15	★★
D-790.	MHCAD 3803-04	Dr. DeMatteo Fax to Dr. Lopez 11/27/15	★★
D-791.	MHCAD 3805-06	Dr. Kemeny Fax to Dr. Lopez 12/10/15	★★
D-792.	MHCAD 3808-13	Outpatient Orders 11/18/15	★★
D-793.	MHCAD 3814-15	Solid Tumor GI Medicine Disposition 11/18/15	★★
D-794.	MHCAD 3816-17	HPB Disposition 11/18/15	★★
D-795.	MHCAD 3823-24	11/17/15 CT of chest, abdomen, and pelvis	★★
D-796.	CD MSK Radiology	Accompanying 11/17/15 film	★★
D-797.	MHCAD 3828	Fax to OHSU 11/13/15	★★
D-798.	MHCAD 3829	Fax to OHSU 11/12/15	★★
D-799.	MHCAD 3831	OHSU Letter 11/11/15	★★
D-800.	MHCAD 3832	Letter to OHSU 11/12/15	★★
D-801.	MHCAD 3833-40	OHSU Fax 11/12/15	★★
D-802.	MHCAD 3841-46	OHSU Fax 12/18/15	★★
D-803.	MHCAD 3847-48	GI Oncology Dr. Kemeny Visit 10/14/15	★★
D-804.	MHCAD 3849	Medical Oncology Outpatient Visit Sheet 10/14/15	★★
D-805.	MHCAD 3850-52	Outpatient Nursing Assessment 10/14/15	★★

D-806.	MHCAD 3853-55	Vital Signs 10/14/15	★★
D-807.	MHCAD 3856	Medication Administration 10/14/15	★★
D-808.	MHCAD 3866	Dr. Kemeny Letter to Dr. Ko 10/14/15	★★
D-809.	MHCAD 3867-68	Dr. Kemeny Fax to Dr. Ko 10/21/15	★★
D-810.	MHCAD 3869-74	Outpatient Orders 10/14/15	★★
D-811.	MHCAD 3875-76	Solid Tumor GI Medicine Disposition 10/14/15	★★
D-812.	MHCAD 3877	Fax to OHSU 9/28/15	★★
D-813.	MHCAD 3894	Letter to OHSU 9/24/15	★★
D-814.	MHCAD 3895	Dr. Kemeny Rx 9/21/15	★★
D-815.	MHCAD 3896-97	GI Oncology Dr. Kemeny Visit 9/16/15	★★
D-816.	MHCAD 3898	Medical Oncology Outpatient Visit Sheet 9/16/15	★★
D-817.	MHCAD 3899-3901	Outpatient Nursing Assessment 9/16/15	★★
D-818.	MHCAD 3902-04	Vital Signs 9/16/15	★★
D-819.	MHCAD 3905	Medication Administration 9/16/15	★★
D-820.	MHCAD 3915	Dr. Kemeny Letter to Dr. Ko 9/16/15	★★
D-821.	MHCAD 3916-21	Outpatient Orders 9/16/15	★★
D-822.	MHCAD 3922-23	Solid Tumor GI Medicine Disposition 9/16/15	★★
D-823.	MHCAD 3937-38	9/15/15 CT of chest, abdomen, and pelvis	★★
D-824.	CD MSK Radiology	Accompanying 9/15/15 film	★★
D-825.	MHCAD 3944-45	9/15/15 MRI of sacrum and coccyx	★★
D-826.	MHCAD 3946	Dr. Kemeny Email Chain Ending 9/10/15	★★
D-827.	MHCAD 3947	Nursing Telephone Call 9/9/15	★★
D-828.	MHCAD 3948	Outpatient Orders 9/9/15	★★
D-829.	MHCAD 3949-52	Express Scripts Letter May 2015	★★
D-830.	MHCAD 3953-56	UCSF Fax 9/8/15	★★
D-831.	MHCAD 3957-60	UCSF Fax 9/4/15	★★
D-832.	MHCAD 3961-62	GI Oncology Dr. Kemeny Visit 8/19/15 signed 8/21/15	★★

D-833.	MHCAD 3963-64	GI Oncology Dr. Kemeny Visit 8/19/15 signed 9/1/15	★★
D-834.	MHCAD 3965	Medical Oncology Outpatient Visit Sheet 8/19/15	★★
D-835.	MHCAD 3966-68	Outpatient Nursing Assessment 8/19/15	★★
D-836.	MHCAD 3969-71	Vital Signs 8/19/15	★★
D-837.	MHCAD 3972	Medication Administration 8/19/15	★★
D-838.	MHCAD 3982	Dr. Kemeny Letter to Dr. Ko 8/19/15	★★
D-839.	MHCAD 3983-84	Dr. Kemeny Fax to Dr. Ko 9/1/15	★★
D-840.	MHCAD 3986-91	Outpatient Orders 8/19/15	★★
D-841.	MHCAD 3992-93	Solid Tumor GI Medicine Disposition 8/19/15	★★
D-842.	MHCAD 3994-97	UCSF Fax 8/5/15	★★
D-843.	MHCAD 3998-99	Dr. Kemeny Visit 7/22/15	★★
D-844.	MHCAD 4000	Medical Oncology Outpatient Visit Sheet 7/22/15	★★
D-845.	MHCAD 4001-03	Outpatient Nursing Assessment 7/22/15	★★
D-846.	MHCAD 4004-06	Vital Signs 7/22/15	★★
D-847.	MHCAD 4007	Medication Administration 7/22/15	★★
D-848.	MHCAD 4016	Dr. Kemeny Letter to Dr. Ko 7/22/15	★★
D-849.	MHCAD 4017-18	Dr. Kemeny Fax to Dr. Ko 7/28/15	★★
D-850.	MHCAD 4019	Outpatient Nursing Encounter 7/22/15	★★
D-851.	MHCAD 4020-25	Outpatient Orders 7/22/15	★★
D-852.	MHCAD 4026-27	Solid Tumor GI Medicine Disposition 7/22/15	★★
D-853.	MHCAD 4028-4031	UCSF Fax 6/24/15	★★
D-854.	MHCAD 4035	Dr. Kemeny Fax to Dr. Ko 7/21/15	★★
D-855.	MHCAD 4038-39	7/21/15 CT of chest, abdomen, and pelvis	★★
D-856.	MHCAD 4043	Nursing Telephone Call 7/9/15	★★
D-857.	MHCAD 4044	Air Transport Medical AZ 7/9/15	★★
D-858.	MHCAD 4045	UCSF Fax 8/9/15	★★
D-859.	MHCAD 4046-47	Dr. Kemeny Visit 6/24/15	★★

D-860.	MHCAD 4048	Medical Oncology Outpatient Visit Sheet 6/24/15	★★
D-861.	MHCAD 4049-51	Outpatient Nursing Assessment 6/24/15	★★
D-862.	MHCAD 4052-54	Vital Signs 6/24/15	★★
D-863.	MHCAD 4055	Medication Administration 6/24/15	★★
D-864.	MHCAD 4066	Dr. Kemeny Letter to Dr. Ko 6/24/15	★★
D-865.	MHCAD 4067-68	Dr. Kemeny Fax to Dr. Ko 7/7/15	★★
D-866.	MHCAD 4069	Outpatient Nursing Encounter 6/24/15	★★
D-867.	MHCAD 4070-06	Outpatient Orders 6/24/15	★★
D-868.	MHCAD 4077-78	Solid Tumor GI Medicine Disposition 6/24/15	★★
D-869.	MHCAD 4079-84	UCSF Fax 6/23/15	★★
D-870.	MHCAD 4085	UCSF Fax 6/24/15	★★
D-871.	MHCAD 4086	Portal Message 6/1/15	★★
D-872.	MHCAD 4087-88	Dr. Kemeny Visit 5/27/15	★★
D-873.	MHCAD 4089-90	Dr. DeMatteo Visit 5/27/15	★★
D-874.	MHCAD 4091	Medical Oncology Outpatient Visit Sheet 5/27/15	★★
D-875.	MHCAD 4092-94	Outpatient Nursing Assessment 5/27/15	★★
D-876.	MHCAD 4095-97	Vital Signs 5/27/15	★★
D-877.	MHCAD 4098	Medication Administration 5/27/15	★★
D-878.	MHCAD 4107-08	Dr. Kemeny Fax to Dr. Ko 6/4/15	★★
D-879.	MHCAD 4109-14	Outpatient Orders 5/27/15	★★
D-880.	MHCAD 4115-16	Solid Tumor GI Medicine Disposition 5/27/15	★★
D-881.	MHCAD 4117-18	HPB Disposition 5/27/15	★★
D-882.	MHCAD 4128-29	5/26/15 CT of chest, abdomen, and pelvis	★★
D-883.	CD MSK Radiology	Accompanying 5/26/15 film	★★
D-884.	MHCAD 4130-32	5/26/15 Body FDG PET/CT	★★
D-885.	CD MSK Radiology	Accompanying 5/26/15 film	★★
D-886.	MHCAD 4133	Outpatient Orders 5/21/15	★★
D-887.	MHCAD 4134	Nursing Telephone Call 5/7/15	★★
D-888.	MHCAD 4135	UCSF Fax 8/9/15	★★
D-889.	MHCAD 4136-39	UCSF Fax 4/30/15	★★

D-890.	MHCAD 4140-41	Dr. Kemeny Visit 4/29/15	★★
D-891.	MHCAD 4142	Medical Oncology Outpatient Visit Sheet 4/29/15	★★
D-892.	MHCAD 4143-45	Outpatient Nursing Assessment 4/29/15	★★
D-893.	MHCAD 4146-48	Vital Signs 4/29/15	★★
D-894.	MHCAD 4149	Medication Administration 4/29/15	★★
D-895.	MHCAD 4159	Dr. Kemeny Letter to Dr. Ko 4/29/15	★★
D-896.	MHCAD 4160-66	Outpatient Orders 4/29/15	★★
D-897.	MHCAD 4167-68	Solid Tumor GI Medicine Disposition 4/29/15	★★
D-898.	MHCAD 4169	UCSF Fax 8/9/15	★★
D-899.	MHCAD 4170	Outpatient Orders 4/28/15	★★
D-900.	MHCAD 4171	Nursing Telephone Call 4/15/15	★★
D-901.	MHCAD 4172-76	UCSF Fax 4/17/15	★★
D-902.	MHCAD 4177	Nursing Telephone Call 4/6/15	★★
D-903.	MHCAD 4178-79	Dr. Kemeny Visit 4/1/15	★★
D-904.	MHCAD 4180	Medical Oncology Outpatient Visit Sheet 4/1/15	★★
D-905.	MHCAD 4181-83	Vital Signs 4/1/15	★★
D-906.	MHCAD 4184-87	Chemotherapy Assessment Record 4/1/15	★★
D-907.	MHCAD 4188	Medication Administration 4/1/15	★★
D-908.	MHCAD 4192	Dr. Kemeny Letter to Dr. Ko 4/1/15	★★
D-909.	MHCAD 4193-98	Outpatient Orders 4/1/15	★★
D-910.	MHCAD 4199-4200	Solid Tumor GI Medicine Disposition 4/1/15	★★
D-911.	MHCAD 4208-09	3/31/15 CT of chest, abdomen, and pelvis	★★
D-912.	CD MSK Radiology	Accompanying 3/31/15 film	★★
D-913.	MHCAD 4210-11	3/31/15 hepatic pump scintigraphy	★★
D-914.	CD MSK Radiology	Accompanying 3/31/15 film	★★
D-915.	MHCAD 4214	Nursing Telephone Call 3/10/15	★★
D-916.	MHCAD 4215-16	Dr. Ko Email to Dr. Kemeny 3/5/15	★★
D-917.	MHCAD 4217	Nursing Telephone Call 3/5/15	★★
D-918.	MHCAD 4218-21	UCSF Fax 3/21/15	★★
D-919.	MHCAD 4222-23	Dr. Kemeny Visit 2/4/15	★★

D-920.	MHCAD 4224	Medical Oncology Outpatient Visit Sheet 2/4/15	★★
D-921.	MHCAD 4225-27	Vital Signs 2/4/15	★★
D-922.	MHCAD 4228-31	Chemotherapy Assessment Record 2/4/15	★★
D-923.	MHCAD 4232	Medication Administration 2/4/15	★★
D-924.	MHCAD 4236	Dr. Kemeny Letter to Dr. Ko 2/4/15	★★
D-925.	MHCAD 4237-42	Outpatient Orders 2/4/15	★★
D-926.	MHCAD 4243-44	Solid Tumor GI Medicine Disposition 2/4/15	★★
D-927.	MHCAD 4249-50	2/3/15 CT of chest, abdomen, and pelvis	★★
D-928.	CD MSK Radiology	Accompanying 2/3/15 film	★★
D-929.	MHCAD 4254-58	UCSF Fax 12/13/01	★★
D-930.	MHCAD 4259-64	UCSF Fax 1/8/15	★★
D-931.	MHCAD 4265-66, 4819	UCSF Fax 11/20/01	★★
D-932.	MHCAD 4267	Outpatient Orders 12/9/14	★★
D-933.	MHCAD 4268-69, 4275	UCSF Fax 10/23/01	★★
D-934.	MHCAD 4270-74	UCSF Fax 12/5/14	★★
D-935.	MHCAD 4276	Nursing Telephone Call 11/25/14	★★
D-936.	MHCAD 4277	Nursing Telephone Call 11/20/14	★★
D-937.	MHCAD 4278-79	Dr. Kemeny Visit 11/19/14	★★
D-938.	MHCAD 4280	Medical Oncology Outpatient Visit Sheet 11/19/14	★★
D-939.	MHCAD 4281-83	Vital Signs 4281-83	★★
D-940.	MHCAD 4284-87	Chemotherapy Assessment Record 11/19/14	★★
D-941.	MHCAD 4288	Medication Administration 11/19/14	★★
D-942.	MHCAD 4292-93	Dr. Kemeny Fax to Dr. Ko 11/27/14	★★
D-943.	MHCAD 4294-98	Outpatient Orders 11/19/14	★★
D-944.	MHCAD 4299-4300	Solid Tumor GI Medicine Disposition 11/19/14	★★
D-945.	MHCAD 4301, 4310-15	UCSF Fax 11/19/14	★★
D-946.	MHCAD 4305-06	11/18/14 CT of chest, abdomen, and pelvis	★★

D-947.	CD MSK Radiology	Accompanying 11/18/14 film	★★
D-948.	MHCAD 4309	Dr. Kemeny Letter to Dr. Ko 11/19/14	★★
D-949.	MHCAD 4316	Dr. Kemeny Fax to Dr. Ko 10/23/14	★★
D-950.	MHCAD 4317-18	Dr. Kemeny Visit 10/22/14	★★
D-951.	MHCAD 4319	Medical Oncology Outpatient Visit Sheet 10/22/14	★★
D-952.	MHCAD 4320-22	Vital Signs 10/22/14	★★
D-953.	MHCAD 4323-26	Chemotherapy Assessment Record 10/22/14	★★
D-954.	MHCAD 4327	Medication Administration 10/22/14	★★
D-955.	MHCAD 4331	Dr. Kemeny Letter to Dr. Ko 10/22/14	★★
D-956.	MHCAD 4332	Outpatient Orders 10/22/14	★★
D-957.	MHCAD 4337	Dr. Kemeny Rx 10/22/14	★★
D-958.	MHCAD 4338-39	Solid Tumor GI Medicine Disposition 10/22/14	★★
D-959.	MHCAD 4341-46	Dr. Ko Visit Note 10/8/14	★★
D-960.	MHCAD 4347-51	UCSF Fax 10/10/14	★★
D-961.	MHCAD 4352-55, 4358-59, 4817-18	UCSF Fax 8/25/01 (really dated 10/10/14)	★★
D-962.	MHCAD 4356-57	UCSF Labs 10/8/14 and 10/18/14	★★
D-963.	MHCAD 4360-61	Chemotherapy Treatment Assessment 9/24/14	★★
D-964.	MHCAD 4363	Dr. Kemeny Rx 9/25/14	★★
D-965.	MHCAD 4364-65	Dr. Kemeny Visit 9/24/14	★★
D-966.	MHCAD 4366-67	Dr. DeMatteo Visit 9/24/14	★★
D-967.	MHCAD 4368	Dr. Garcia-Aguilar Visit 9/24/14	★★
D-968.	MHCAD 4369	Medical Oncology Outpatient Visit Sheet 9/24/14	★★
D-969.	MHCAD 4370-72	Vital Signs 9/24/14	★★
D-970.	MHCAD 4373-76	Chemotherapy Assessment Record 9/24/14	★★
D-971.	MHCAD 4377	Medication Administration 9/24/14	★★
D-972.	MHCAD 4380	Dr. Kemeny Letter to Dr. Ko 9/24/14	★★
D-973.	MHCAD 4381-82	Dr. DeMatteo Fax to Dr. Ko 10/15/14	★★



D-974.	MHCAD 4383-87	Outpatient Orders 9/24/14	★★
D-975.	MHCAD 4388-89	Solid Tumor GI Medicine Disposition 9/24/14	★★
D-976.	MHCAD 4390-91	HPB Disposition 9/24/14	★★
D-977.	MHCAD 4392-93	Colorectal Disposition 9/24/14	★★
D-978.	MHCAD 4394-4401	Chemotherapy Learning Needs Assessment 9/24/14	★★
D-979.	MHCAD 4405-06	9/23/14 CT of chest, abdomen, and pelvis	★★
D-980.	CD MSK Radiology	Accompanying 9/23/14 film	★★
D-981.	MHCAD 4412	Intra Operative Note 9/11/14	★★
D-982.	MHCAD 4413	Low Nutrition Risk Assessment 9/12/14	★★
D-983.	MHCAD 4414-15	New Patient Evaluation Dr. Garcia-Aguilar 9/11/14	★★
D-984.	MHCAD 4416	Pain Note 9/19/14	★★
D-985.	MHCAD 4417	Surgery Note 9/19/14	★★
D-986.	MHCAD 4418-19	HPB Surgery Note 9/19/14	★★
D-987.	MHCAD 4420-22	Discharge Summary 9/19/14	★★
D-988.	MHCAD 4423-27	Discharge Orders 9/11/14 - 9/19/14	★★
D-989.	MHCAD 4428-39	Vital Signs 9/11/14 - 9/19/14	★★
D-990.	MHCAD 4440-55	Medication Administration Record 9/11/14 - 9/18/14	★★
D-991.	MHCAD 4456-89	I&O Flowsheets 9/11/14 - 9/19/14	★★
D-992.	MHCAD 4496-98	Part 2 Pre-Surgery Adult Assessment 9/11/14	★★
D-993.	MHCAD 4499-4502	Pre-Procedure Assessment 9/11/14	★★
D-994.	MHCAD 4503-05	Nursing Ongoing Assessment 9/19/14 AM	★★
D-995.	MHCAD 4506-08	Nursing Focused Assessment 9/11/14 - 9/19/14	★★
D-996.	MHCAD 4572-73	PACU Admission & Discharge Assessment 9/11/14	★★
D-997.	MHCAD 4576	PACU Flow Sheet 9/11/14	★★
D-998.	MHCAD 4577	PACU Progress Notes 9/11/14	★★
D-999.	MHCAD 4579	Anesthesia Perioperative Record Part 3 9/11/14	★★
D-1000.	MHCAD 4580-4635	Orders 9/11/14 - 9/19/14	★★
D-1001.	MHCAD 4637	Intraoperative Medication Orders 9/11/14	★★



D-1002.	MHCAD 4640-41	Pain Note 9/18/14	★★
D-1003.	MHCAD 4642-43	HPB Surgery Note 9/18/14	★★
D-1004.	MHCAD 4644-46	Nursing Ongoing Assessment 9/18/14 PM	★★
D-1005.	MHCAD 4647-49	Nursing Ongoing Assessment 9/18/14 AM	★★
D-1006.	MHCAD 4651-52	Pain Note 9/17/14	★★
D-1007.	MHCAD 4653-54	Social Work Note 9/17/14	★★
D-1008.	MHCAD 4655	Event Note 9/17/14	★★
D-1009.	MHCAD 4656-57	HPB Surgery Note 9/17/14	★★
D-1010.	MHCAD 4658	Case Management Discharge Plan 9/17/14	★★
D-1011.	MHCAD 4659-62	Nursing Ongoing Assessment 9/17/14 PM	★★
D-1012.	MHCAD 4663-67	Nursing Ongoing Assessment 9/17/14 AM	★★
D-1013.	MHCAD 4670-71	Pain Note 9/16/14	★★
D-1014.	MHCAD 4672-73	Social Work Note 9/16/14	★★
D-1015.	MHCAD 4674-75	HPB Surgery Note 9/16/14	★★
D-1016.	MHCAD 4676-79	Nursing Ongoing Assessment 9/16/14 PM	★★
D-1017.	MHCAD 4680-82	Nursing Ongoing Assessment 9/16/14 AM	★★
D-1018.	MHCAD 4685-86	9/16/14 hepatic pump scintigraphy	★★
D-1019.	CD MSK Radiology	Accompanying 9/16/14 film	★★
D-1020.	MHCAD 4687-88	Protocol Eligibility Checklist 9/10/14	★★
D-1021.	MHCAD 4689-90	Pain Note 9/15/14 AM	★★
D-1022.	MHCAD 4691-92	Pain Note 9/15/14 PM	★★
D-1023.	MHCAD 4693-94	Massage Therapy Note 9/15/14	★★
D-1024.	MHCAD 4695-96	HPB Surgery Note 9/15/14	★★
D-1025.	MHCAD 4697-98	Nursing Event Note 9/15/14	★★
D-1026.	MHCAD 4699-4702	Nursing Ongoing Assessment 9/15/14 AM	★★
D-1027.	MHCAD 4703-05	Nursing Ongoing Assessment 9/15/14 PM	★★
D-1028.	MHCAD 4706-07	Solid Tumor GI Medicine Disposition 9/15/14	★★
D-1029.	MHCAD 4711-12	Pain Note 9/14/14	★★
D-1030.	MHCAD 4713-15	HPB Surgery Note 9/14/14	★★
D-1031.	MHCAD 4716-18	Nursing Ongoing Assessment 9/14/14 PM	★★

D-1032.	MHCAD 4719-21	Nursing Ongoing Assessment 9/14/14 AM	★★
D-1033.	MHCAD 4724-25	Pain Note 9/13/14	★★
D-1034.	MHCAD 4726-28	HPB Surgery Note 9/13/14	★★
D-1035.	MHCAD 4729-30	Dr. DeMatteo Fax to Dr. Ko 9/15/14	★★
D-1036.	MHCAD 4731-34	Nursing Ongoing Assessment 9/13/14 PM	★★
D-1037.	MHCAD 4734-36	Nursing Ongoing Assessment 9/13/14 AM	★★
D-1038.	MHCAD 4737-39	Hepatobiliary Operative Report 9/13/14	★★
D-1039.	MHCAD 4742-43	Pain Note 9/12/14	★★
D-1040.	MHCAD 4744-45	Initial Social Work Note 9/12/14	★★
D-1041.	MHCAD 4746-47	HPB Surgery Note 9/12/14	★★
D-1042.	MHCAD 4748-50	Colorectal Surgery Note 9/12/14	★★
D-1043.	MHCAD 4751	Home Medication List 9/12/14	★★
D-1044.	MHCAD 4752-55	Initial Nursing Assessment Post-Surgery 9/12/14	★★
D-1045.	MHCAD 4756	Nursing Event Note 9/12/14 1:03 AM	★★
D-1046.	MHCAD 4757	Nursing Event Note 9/12/14 12:41 AM	★★
D-1047.	MHCAD 4758-60	Nursing Ongoing Assessment 9/12/14 PM	★★
D-1048.	MHCAD 4761-63	Nursing Ongoing Assessment 9/12/14 AM	★★
D-1049.	MHCAD 4764-65	Outpatient Orders 9/12/14	★★
D-1050.	MHCAD 4771-72	Pain Note 9/11/14	★★
D-1051.	MHCAD 4773	Initial Visit - Chaplaincy Service 9/11/14	★★
D-1052.	MHCAD 4774-84	Medication Administration 9/11/14 - 9/19/14	★★
D-1053.	MHCAD 4785-86	Dr. DeMatteo Fax to Dr. Ko 9/22/14	★★
D-1054.	MHCAD 4787-88	Dr. Garcia-Aguilar Fax to Dr. Ko 9/12/14	★★
D-1055.	MHCAD 4789-90	Dr. DeMatteo Fax to Dr. Ko 9/18/14	★★
D-1056.	MHCAD 4791-92	Colorectal Operative Report 9/11/14	★★

D-1057.	MHCAD 4793-4800	Operating Room Record 9/11/14	★★
D-1058.	MHCAD 4801	Brief Operative Note 9/11/14	★★
D-1059.	MHCAD 4802-13	Anesthesia Record 9/11/14	★★
D-1060.	MHCAD 4814-16	Procedure Time-Out 9/11/14	★★
D-1061.	MHCAD 4820-25	Surgical Pathology Report 9/11/14 Procedure	★★
D-1062.	MHCAD 1826-27	Molecular Pathology Report 9/11/14 Procedure	★★
D-1063.	MHCAD 4828	Patient Consent 9/10/14	★★
D-1064.	MHCAD 4830-31	Dr. Kemeny Visit 9/10/14	★★
D-1065.	MHCAD 4832-33	Dr. DeMatteo Initial Consultation 9/10/14	★★
D-1066.	MHCAD 4834	Pre-Surgical Testing Visit Sheet 9/10/14	★★
D-1067.	MHCAD 4835	Medical Oncology Outpatient Visit Sheet 9/10/14	★★
D-1068.	MHCAD 4836-37	Pre-Surgical Screening Note 9/10/14	★★
D-1069.	MHCAD 4839	Vital Signs 9/10/14	★★
D-1070.	MHCAD 4843-44	Dr. Kemeny Fax to Dr. Ko 9/23/14	★★
D-1071.	MHCAD 4845-46	Dr. DeMatteo Fax to Dr. Ko 9/22/14	★★
D-1072.	MHCAD 4847-48	Part 1 Pre-Procedure Nursing 9/10/14	★★
D-1073.	MHCAD 4849-51	Anesthesia Perioperative Evaluation 9/10/14	★★
D-1074.	MHCAD 4852-54	Outpatient Orders 9/10/14	★★
D-1075.	MHCAD 4855-56	Solid Tumor GI Medicine Disposition 9/10/14	★★
D-1076.	MHCAD 4857-58	HPB Disposition 9/10/14	★★
D-1077.	MHCAD 4859-67	Informed Consent for Clinical Research and Forms 9/10/14	★★
D-1078.	MHCAD 4868-69	Protocol Eligibility Checklist 9/10/14	★★
D-1079.	MHCAD 4872	Outpatient Orders 9/9/14	★★
D-1080.	MHCAD 4874-75	9/9/14 CT of chest, abdomen, and pelvis	★★
D-1081.	CD MSK Radiology	Accompanying 9/9/14 film	★★
D-1082.	MHCAD 4879	Patient Consent 9/8/14	★★
D-1083.	MHCAD 4881	Dr. Garcia-Aguilar Visit 9/8/14	★★

D-1084.	MHCAD 4883-84	Part 1 Pre-Procedure Nursing 9/8/14	★★
D-1085.	MHCAD 4885-87	Outpatient Orders 9/8/14	★★
D-1086.	MHCAD 4888-89	Colorectal Disposition 9/8/14	★★
D-1087.	MHCAD 4890	Nursing Telephone Call 9/4/14	★★
D-1088.	MHCAD 4891	Nursing Telephone Call 8/18/14	★★
D-1089.	MHCAD 4892-93	HPB Disposition 8/7/14	★★
D-1090.	MHCAD 4895	Patient Questionnaire for IV Contrast 7/30/14	★★
D-1091.	MHCAD 4898-99	Informed Consent for MSK-IMPACT Test 7/30/14	★★
D-1092.	MHCAD 4900-01, 4912-15	New Patient Evaluation Dr. Garcia-Aguilar 7/30/14	★★
D-1093.	MHCAD 4902-06	Initial Consultation Dr. Kemeny 7/30/14	★★
D-1094.	MHCAD 4907-09	Initial Consultation Dr. Garcia-Aguilar 7/30/14	★★
D-1095.	MHCAD 4910	Dr. Kemeny Progress Note 7/30/14	★★
D-1096.	MHCAD 4916	Medical Oncology Outpatient Visit Sheet 7/30/14	★★
D-1097.	MHCAD 4917	Vital Signs 7/30/14	★★
D-1098.	MHCAD 4919	Home Medication List 7/30/14	★★
D-1099.	MHCAD 4922-23	Dr. Kemeny Fax to Dr. Ko 8/7/14	★★
D-1100.	MHCAD 4924-27	Outpatient Orders 7/30/14	★★
D-1101.	MHCAD 4929-30	Solid Tumor GI Medical Disposition 7/30/14	★★
D-1102.	MHCAD 4931-32	Colorectal Disposition 7/30/14	★★
D-1103.	MHCAD 4933	Molecular Pathology Report 7/30/14 Procedure	★★
D-1104.	MHCAD 4934-35	7/30/14 CT of Chest, abdomen and pelvis with liver angiography	★★
D-1105.	CD MSK Radiology	Accompanying 7/30/14 film	★★
D-1106.	MHCAD 4939-40	Molecular Pathology Report 4/21/14 Procedure	★★
D-1107.	MHCAD 4941-44	Outpatient Orders 7/23/14	★★
D-1108.	MHCAD 4946	Pathology Report 4/21/14 Procedure	★★
D-1109.	MHCAD 4947	Molecular Pathology Report 4/10/14 Procedure	★★
D-1110.	MHCAD 4949	Dr. Kemeny Email Chain Ending 7/21/14	★★

D-1111.	MHCAD 4951	Dr. Kemeny Email Chain Ending 7/17/14	★★
D-1112.	MHCAD 4952	Outpatient Orders 7/17/14	★★
D-1113.	MHCAD 4953	Pathology Report 4/10/14 Procedure	★★
D-1114.	MHCAD 4954-57	CPMC Release of Pathology	★★
D-1115.	MHCAD 4958-71, 4975-5016, 5018-35, 5037-46, 5050-57	Powers Fax to Jeban 7/1/14	★★
D-1116.	MHCAD 4972-74	UCSF CT Abdomen Pelvis 6/24/14	★★
D-1117.	MHCAD 5017	Sutter Health Admission Sheet 4/30/14	★★
D-1118.	MHCAD 5036	Sutter Health Surgical Pathology Report 4/21/14 Procedure	★★
D-1119.	MHCAD 5047-49	Sutter Health Surgical Pathology Report 4/10/14 Procedure	★★
D-1120.	CPMC Sutter Health 386	US Pelvis 4/2/14	★★
D-1121.	CPMC Sutter Health 401-02	CT Abdomen Pelvis 4/8/14	★★
D-1122.	CD CPMC Radiology	Accompanying 4/8/14 film	★★
D-1123.	CPMC Sutter Health 422-24	IR History and Physical 4/10/14	★★
D-1124.	CPMC Sutter Health 424-431	Hospitalist History and Physical 4/10/14	★★
D-1125.	CPMC Sutter Health 466-67	IR Post Procedure Note 4/10/14	★★
D-1126.	CPMC Sutter Health 501-02	4/10/14 CT Abdomen Retroperitoneal Mass Biopsy	★★
D-1127.	CD CPMC Radiology	Accompanying 4/10/14 film	★★
D-1128.	CPMC Sutter Health 502-03	4/11/14 US Abdomen	★★
D-1129.	CD CPMC Radiology	Accompanying 4/11/14 film	★★
D-1130.	CPMC Sutter Health 503-05	Surgical Pathology 4/10/14 Procedure	★★
D-1131.	CPMC Sutter Health 970-77	Internal Medicine Progress Note 4/14/14	★★
D-1132.	CPMC Sutter Health 978-81	Oncology Note 4/14/14	★★
D-1133.	CPMC Sutter Health 986-87	Progress Note 4/13/14	★★

D-1134.	CPMC Sutter Health 987-88	Progress Note 4/15/14	★★
D-1135.	CPMC Sutter Health 996	GI Progress Note 4/15/14	★★
D-1136.	CPMC Sutter Health 1030	Consent to Procedure 4/10/14	★★
D-1137.	CPMC Sutter Health 1151-52	Surgical Pathologoy CT-guided core biopsy #1 liver	★★
D-1138.	CPMC Sutter Health 1164-66	Colonoscopy 4/21/14	★★
D-1139.	CPMC Sutter Health 1170-71	Surgical Pathology Colonoscopy	★★
D-1140.	CPMC Sutter Health 1241	4/21/14 Admission Information	★★
D-1141.	CPMC Sutter Health 1241-46	Discharge Summary 4/22/14	★★
D-1142.	CPMC Sutter Health 1247-51	ED Provider Note 4/21/14	★★
D-1143.	UCSF 37-42	Discharge Summary 5/7/14	★★
D-1144.	UCSF 128-33	ED Note 6/3/14	★★
D-1145.	UCSF 209-14	ED Note 10/18/14	★★
D-1146.	UCSF 353	RN Note 4/5/15	★★
D-1147.	UCSF 379	RN Note 5/3/15	★★
D-1148.	UCSF 401	Admission Orders 5/31/15	★★
D-1149.	UCSF 434-35	Luriko Ajari Note 12/4/12	★★
D-1150.	UCSF 442-47	Dr. Ko Note 4/23/14	★★
D-1151.	UCSF 447-48	FOLFOX Chemotherapy Patient Education 4/28/14	★★
D-1152.	UCSF 448-51	Dr. Ko Note 5/15/14	★★
D-1153.	UCSF 451-55	Amie M Blanco, MS Note 5/23/14	★★
D-1154.	UCSF 455-57	Dr. Ko Note 5/29/14	★★
D-1155.	UCSF 458-60	Dr. Elnachef Note 6/6/14	★★
D-1156.	UCSF 460-63	Dr. Ko Note 6/12/14	★★
D-1157.	UCSF 463-66	Amie M Blanco, MS Note 6/19/14	★★
D-1158.	UCSF 466-69	Dr. Ko Note 6/25/14	★★
D-1159.	UCSF 469-72	Dr. Woeber Note 7/9/14	★★
D-1160.	UCSF 472-75	Dr. Ko Note 7/24/14	★★
D-1161.	UCSF 476-80	Dr. Ko Note 8/11/14	★★
D-1162.	UCSF 480-83	Dr. Ko Note 8/21/14	★★
D-1163.	UCSF 483-87	Dr. Ko Note 10/8/14	★★
D-1164.	UCSF 489-93	NP Weber Note 10/8/14	★★
D-1165.	UCSF 493-98	Dr. Finlayson Note 10/14/14	★★

D-1166.	UCSF 502-05	Dr. Ko Note 11/6/14	★★
D-1167.	UCSF 505-09	Dr. Ko Note 12/4/14	★★
D-1168.	UCSF 509-13	NP Weber Note 12/4/14	★★
D-1169.	UCSF 513-18	NP Weber Note 12/18/14	★★
D-1170.	UCSF 522-26	Dr. Ko Note 1/8/15	★★
D-1171.	UCSF 526-30	NP Weber Note 1/21/15	★★
D-1172.	UCSF 537-40	Dr. Ko Note 2/5/15	★★
D-1173.	UCSF 541-45	NP Weber Note 2/18/15	★★
D-1174.	UCSF 545-47	Dr. Chen Note 3/3/15	★★
D-1175.	UCSF 548-53	NP Weber Note 3/4/15	★★
D-1176.	UCSF 553-57	Dr. Siegel Note 3/5/15	★★
D-1177.	UCSF 557-60	Dr. Carnevale Note 4/15/15	★★
D-1178.	UCSF 560-63	Dr. Ko Note 4/30/15	★★
D-1179.	UCSF 563-67	NP Weber Note 5/13/15	★★
D-1180.	UCSF 567-71	NP Weber Note 6/11/15	★★
D-1181.	UCSF 572-76	Dr. Carnevale Note 6/17/15	★★
D-1182.	UCSF 576-79	Dr. Ko Note 7/8/15	★★
D-1183.	UCSF 579-82	NP Weber Note 7/9/15	★★
D-1184.	UCSF 582-87	Hospital Medicine Initial Consult Note 7/11/15	★★
D-1185.	UCSF 587-92	Dr. Appelle Note 7/13/15	★★
D-1186.	UCSF 592-94	Dr. Ko Note 8/5/15	★★
D-1187.	UCSF 594-98	NP Weber Note 8/9/15	★★
D-1188.	UCSF 598-602	NP Weber Note 9/2/15	★★
D-1189.	UCSF 602-05	Dr. Carnevale Note 9/2/15	★★
D-1190.	UCSF 605-09	Dr. Woeber Note 9/9/15	★★
D-1191.	UCSF 609-12	Dr. Carnevale Note 9/30/15	★★
D-1192.	UCSF 612-16	NP Weber Note 9/30/15	★★
D-1193.	UCSF 616-19	Dr. Carnevale Note 10/28/15	★★
D-1194.	UCSF 620-24	NP Weber Note 10/29/15	★★
D-1195.	UCSF 980-81	Surgical Pathology Report 6/10/14 Procedure	★★
D-1196.	UCSF 990-91	4/28/14 CT Chest	★★
D-1197.	UCSF 991-93	6/24/14 CT Abdomen/Pelvis	★★
D-1198.	ZAK_NY 7041	OHSU Telephone Note 4/18/17	★★
D-1199.	ZAK_NY 7041-2	OHSU RN Maccini Note 4/18/17	★★
D-1200.	ZAK_NY 7045-46	OHSU RN Baker Note 4/5/17	★★
D-1201.	ZAK_NY 7046	OHSU Chemotherapy Nurse Note 4/5/17	★★
D-1202.	ZAK_NY 7055-62	OHSU Dr. Lopez Note 4/5/17	★★

D-1203.	ZAK_NY 7095	OHSU RN Maccini Note 4/5/17	★★
D-1204.	ZAK_NY 7099-7106	OHSU ED Note 4/5/17	★★
D-1205.	ZAK_NY 7160	OHSU Telephone Note 4/4/17	★★
D-1206.	ZAK_NY 7163-64	OHSU Chemotherapy Nurse Note 3/24/17	★★
D-1207.	ZAK_NY 7262	OHSU Telephone Note 3/22/17	★★
D-1208.	ZAK_NY 7262-63	OHSU RN Schaefer Note 3/22/17	★★
D-1209.	ZAK_NY 7348-49	OHSU Chemotherapy Nurse Note 2/24/17	★★
D-1210.	ZAK_NY 7367-76	OHSU PA Smith Note 2/24/17	★★
D-1211.	ZAK_NY 7411	OHSU Message re Labs 2/20/17	★★
D-1212.	ZAK_NY 7429-32	OHSU Dermatology Dr. Rojek Note 2/17/17	★★
D-1213.	ZAK_NY 7460-61	OHSU Chemotherapy Nurse Note 2/10/17	★★
D-1214.	ZAK_NY 7481-90	OHSU PA Smith Note 2/10/17	★★
D-1215.	ZAK_NY 7518-19	OHSU Messages re Rash 2/6/17 - 2/15/17	★★
D-1216.	ZAK_NY 7533	OHSU Telephone Note 2/2/17	★★
D-1217.	ZAK_NY 7533-34	OHSU RN Maccini Notes 2/2/17	★★
D-1218.	ZAK_NY 7541-48	OHSU Dr. Lopez Note 2/1/17	★★
D-1219.	ZAK_NY 7575-76	OHSU Chemotherapy Nurse Note 1/27/17	★★
D-1220.	ZAK_NY 7598-7601	OHSU NP Benedict Note 1/27/17	★★
D-1221.	ZAK_NY 7630-33	OHSU Dermatology Dr. Arthur Note 1/20/17	★★
D-1222.	ZAK_NY 7645-46	OHSU Chemotherapy Nurse Note 1/13/17	★★
D-1223.	ZAK_NY 7689-90	OHSU Chemotherapy Nurse Note 12/30/16	★★
D-1224.	ZAK_NY 7735-36	OHSU Chemotherapy Nurse Note 12/16/16	★★
D-1225.	ZAK_NY 7756-59	OHSU Dr. Lopez Note 12/14/16	★★
D-1226.	ZAK_NY 7806-07	OHSU Chemotherapy Nurse Note 12/2/16	★★
D-1227.	ZAK_NY 7827-28	OHSU Chemotherapy Nurse Note 11/18/16	★★
D-1228.	ZAK_NY 7854	OHSU RN Mead Note 11/16/16	★★
D-1229.	ZAK_NY 7868-71	OHSU PA Smith Note 11/16/16	★★
D-1230.	ZAK_NY 7902-03	OHSU Chemotherapy Nurse Note 11/4/16	★★
D-1231.	ZAK_NY 7923	OHSU RN Hansen Note 11/2/16	★★
D-1232.	ZAK_NY 7972	OHSU Dr. Yoo Note 11/1/16	★★



D-1233.	ZAK_NY 7983-84	OHSU Chemotherapy Nurse Note 10/21/16	★★
D-1234.	ZAK_NY 8027-28	OHSU Chemotherapy Nurse Note 10/19/16	★★
D-1235.	ZAK_NY 8051-52	OHSU RN Maccini Note 10/13/16	★★
D-1236.	ZAK_NY 8064-65	OHSU Chemotherapy Nurse Note 10/7/16	★★
D-1237.	ZAK_NY 8086-90	OHSU NP Benedict Note 10/7/16	★★
D-1238.	ZAK_NY 8110-11	OHSU Chemotherapy Nurse Note 9/28/16	★★
D-1239.	ZAK_NY 8152-54	OHSU Dr. Yoo Note 9/27/16	★★
D-1240.	ZAK_NY 8174-75	OHSU Chemotherapy Nurse Note 9/23/16	★★
D-1241.	ZAK_NY 8196-99	OHSU NP Johnson Note 9/22/16	★★
D-1242.	ZAK_NY 8218-19	OHSU Chemotherapy Nurse Note 9/14/16	★★
D-1243.	ZAK_NY 8231-32	OHSU Chemotherapy Nurse Note 9/9/16	★★
D-1244.	ZAK_NY 8253	OHSU Telephone Encounter & RN Maccini Note 8/31/16	★★
D-1245.	ZAK_NY 8271	OHSU Telephone Encounter & RN Maccini Note 8/23/16	★★
D-1246.	ZAK_NY 8275-76	OHSU Telephone Encounter & RN Maccini Note 8/18/16	★★
D-1247.	ZAK_NY 8280-81	OHSU Chemotherapy Nurse Note 8/5/16	★★
D-1248.	ZAK_NY 8304-05	OHSU Chemotherapy Nurse Note 8/3/16	★★
D-1249.	ZAK_NY 8322-23	OHSU Chemotherapy Nurse Note 7/22/16	★★
D-1250.	ZAK_NY 8378-79	OHSU Telephone Encounter 7/19/16	★★
D-1251.	ZAK_NY 8390-91	OHSU Chemotherapy Nurse Note 7/8/16	★★
D-1252.	ZAK_NY 8421-24	OHSU Dr. Lopez Note 7/6/16	★★
D-1253.	ZAK_NY 8445-46	OHSU Chemotherapy Nurse Note 7/6/16	★★
D-1254.	ZAK_NY 8458-60	OHSU Chemotherapy Nurse Note 6/24/16	★★
D-1255.	ZAK_NY 8519-20	OHSU Chemotherapy Nurse Note 6/10/16	★★
D-1256.	ZAK_NY 8520-21	OHSU RN Orlowsky Note 6/10/16	★★
D-1257.	ZAK_NY 8550-55	OHSU Dr. Lopez Note 6/8/16	★★
D-1258.	ZAK_NY 8603	OHSU RN Tope Note 5/29/16	★★

D-1259.	ZAK_NY 8611-12	OHSU Chemotherapy Nurse Note 5/27/16	★★
D-1260.	ZAK_NY 8680-83	OHSU Genetic Counselor Note 5/19/16	★★
D-1261.	ZAK_NY 8694	OHSU RN Dang Note 5/15/16	★★
D-1262.	ZAK_NY 8704-05	OHSU Chemotherapy Nurse Note 5/13/16	★★
D-1263.	ZAK_NY 8749	OHSU RN Hansen Note 5/11/16	★★
D-1264.	ZAK_NY 8763-66	OHSU Dr. Lopez Note 5/4/16	★★
D-1265.	ZAK_NY 8794-99	OHSU Dr. Mayo Note 5/4/16	★★
D-1266.	ZAK_NY 8815	OHSU RN Tope Note 5/1/16	★★
D-1267.	ZAK_NY 8825-26	OHSU Chemotherapy Nurse Note 4/29/16	★★
D-1268.	ZAK_NY 8888-94	OHSU ED Notes 4/21/16 - 4/22/16	★★
D-1269.	ZAK_NY 8941-44	OHSU Messages re PET Scan 4/20/16 - 4/21/16	★★
D-1270.	ZAK_NY 9009-11	OHSU Telephone Encounter & Notes 3/22/16	★★
D-1271.	ZAK_NY 9014-15	OHSU Telephone Encounter & Notes 3/17/16	★★
D-1272.	ZAK_NY 9018-22	OHSU Dr. Li Note 3/15/16	★★
D-1273.	ZAK_NY 9045	OHSU RN Tope Note 3/12/16	★★
D-1274.	ZAK_NY 9112-13	OHSU Telephone Encounter & RN Maccini Note 3/9/16	★★
D-1275.	ZAK_NY 9119-22	OHSU PA Smith Note 3/2/16	★★
D-1276.	ZAK_NY 9145	OHSU Telephone Encounter & RN Maccini Note 2/29/16	★★
D-1277.	ZAK_NY 9148	OHSU RN Lauka Note 2/28/16	★★
D-1278.	ZAK_NY 9162-65	OHSU PA Smith Note 2/26/16	★★
D-1279.	ZAK_NY 9198-9201	OHSU Dr. Lopez Note 2/23/16	★★
D-1280.	ZAK_NY 9227-28	OHSU Telephone Encounter & RN Maccini Note 2/22/16	★★
D-1281.	ZAK_NY 9255-56	OHSU RN Sterling Note 2/12/16	★★
D-1282.	ZAK_NY 9280-84	OHSU Dr. Mayo Note 2/10/16	★★
D-1283.	ZAK_NY 9319-22	OHSU Dr. Lopez Note 2/2/16	★★
D-1284.	ZAK_NY 9336	OHSU RN Hall Note 1/13/16	★★
D-1285.	ZAK_NY 9475	OHSU RN Orłowsky Note 1/4/16	★★
D-1286.	ZAK_NY 9494	OHSU RN Maccini Note 12/30/15	★★
D-1287.	ZAK_NY 9507-08	OHSU Chemotherapy Nurse Note 12/29/15	★★
D-1288.	ZAK_NY 9569	OHSU RN Browne Note 12/10/15	★★
D-1289.	ZAK_NY 9578-79	OHSU LCSW Macuiba Note 12/8/15	★★

D-1290.	ZAK_NY 9606	OHSU RN Orlowsky Note 12/2/15	★★
D-1291.	ZAK_NY 9663	OHSU RN Lauka Note 11/22/15	★★
D-1292.	ZAK_NY 9675-76	OHSU RN Gramberg Note 11/20/15	★★
D-1293.	ZAK_NY 9679-80	OHSU Chemotherapy Nurse Note 11/20/15	★★
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D-1294.	ZAK_NY 9704	OHSU Telephone Encounter 11/20/15	★★
D-1295.	ZAK_NY 9819-28	OHSU Dr. Mayo Note 11/11/15	★★
D-1296.	ZAK_NY 9877-80	UCSF NP Weber Note 8/9/15	★★
D-1297.	ZAK_NY 9970-71	OHSU LCSW Macuiba Note 11/10/15	★★
D-1298.	ZAK_NY 9974-82	OHSU Dr. Lopez Note 11/10/15	★★
D-1299.	ZAK_NY 023-26	OHSU MRI Interpretation 10/26/18 Reported 11/9/18	★★
D-1300.	ZAK_NY 028-31	OHSU PET Interpretation 9/25/18 Reported 11/8/18	★★
D-1301.	ZAK_NY 034-35	OHSU Telephone Encounters 7/11/18	★★
D-1302.	ZAK_NY 040	OHSU Notes 6/4/18	★★
D-1303.	ZAK_NY 100-06	OHSU Dr. Pommier Note 5/26/18	★★
D-1304.	ZAK_NY 107-11	OHSU Dr. Mayo Note 5/29/18	★★
D-1305.	ZAK_NY 111-17	OHSU Dr. Forrest Note 5/27/18	★★
D-1306.	ZAK_NY 129-35	OHSU Dr. Campos Note 5/27/18	★★
D-1307.	ZAK_NY 135-38	OHSU Dr. Woelber Note 5/27/18	★★
D-1308.	ZAK_NY 177-78	OHSU US Abdomen limited 5/29/18	★★
D-1309.	CD OHSU Radiology	Accompanying 5/29/18 film	★★
D-1310.	ZAK_NY 293-300	OHSU Dr. Schultz Note 5/12/18	★★
D-1311.	ZAK_NY 300-05	OHSU Dr. Mayo Note 5/14/18	★★
D-1312.	ZAK_NY 305-10	OHSU Dr. Sukerman Note 5/13/18	★★
D-1313.	ZAK_NY 310-18	OHSU Dr. Li Note 5/14/18	★★
D-1314.	ZAK_NY 325-326	OHSU Dr. Addicott Note 5/13/16	★★
D-1315.	ZAK_NY 326-29	OHSU Dr. Mayo Note 5/14/18	★★
D-1316.	ZAK_NY 591	OHSU Telephone Encounter & RN Maccini Note 4/24/18	★★
D-1317.	ZAK_NY 804-08	OHSU Dr. Pasko Note 4/2/18	★★
D-1318.	ZAK_NY 808-11	OHSU RN Tobin-Shubin Note 4/2/18	★★
D-1319.	ZAK_NY 816-17	OHSU Brief IR Procedure Note 4/2/18	★★
D-1320.	ZAK_NY 844-46	OHSU Biliary tube exchange 4/2/18	★★
D-1321.	ZAK_NY 993-94	OHSU Telephone Encounter & RN Maccini Note 3/22/18	★★
D-1322.	ZAK_NY 1113-17	OHSU Discharge Summary 3/2/18	★★

D-1323.	ZAK_NY 1117-25	OHSU Dr. Hum & Dr. Zaman Notes 2/26/18	★★
D-1324.	ZAK_NY 1126-36	OHSU Dr. Boothby & Dr. Maier Notes 2/26/18	★★
D-1325.	ZAK_NY 1191-93	OHSU Dr. Shabrang & Dr. Farsad Notes 2/28/18	★★
D-1326.	ZAK_NY 1193-96	OHSU Dr. Mitra & Dr. Otaki Notes 2/28/18	★★
D-1327.	ZAK_NY 1196-1200	OHSU Dr. Jedrzejewski & Dr. Mayo Notes 2/28/18	★★
D-1328.	ZAK_NY 1200-03	OHSU Dr. Pasko & Dr. Mayo Notes 3/1/18	★★
D-1329.	ZAK_NY 1203-04	OHSU RN Parrish Note 2/26/18	★★
D-1330.	ZAK_NY 1514-26	OHSU ED Notes 2/14/18	★★
D-1331.	ZAK_NY 1550-55	OHSU Discharge Summary 2/15/18	★★
D-1332.	ZAK_NY 1560-65	OHSU Dr. Gilliam & Dr. Mayo Notes 2/14/18	★★
D-1333.	ZAK_NY 1568-73	OHSU Dr. Khalsa Note 2/14/18	★★
D-1334.	ZAK_NY 1573-76	OHSU Dr. Jedrzejewski & Dr. Mayo Notes 2/15/18	★★
D-1335.	ZAK_NY 1576-77	OHSU Dr. Kaufman Note 2/15/18	★★
D-1336.	ZAK_NY 1615-18	OHSU CTA Abdomen and Pelvis 2/14/18	★★
D-1337.	CD OHSU Radiology	Accompanying 2/14/18 film	★★
D-1338.	ZAK_NY 1838-45	OHSU Discharge Summary 2/6/18	★★
D-1339.	ZAK_NY 1846-53	OHSU PA Wogu & Dr. Lee Notes 2/5/18	★★
D-1340.	ZAK_NY 1859	OHSU Brief IR Procedure Note 2/5/18	★★
D-1341.	ZAK_NY 1860-63	OHSU Brief Vascular and IR Progress Note 2/6/18	★★
D-1342.	ZAK_NY 1887-89	OHSU Bilateral Biliary Tube Exchange 2/5/18	★★
D-1343.	ZAK_NY 1989-1990	OHSU Telephone Encounter 2/2/18	★★
D-1344.	ZAK_NY 2045-52	OHSU Discharge Summary 2/1/18	★★
D-1345.	ZAK_NY 2069-73	OHSU Dr. Duvall & Dr. Bensch Notes 2/1/18	★★
D-1346.	ZAK_NY 2085-88	OHSU Dr. Ando & Dr. Kelley Notes 1/31/18	★★
D-1347.	ZAK_NY 2088-89	OHSU Dr. Sullivan Note 1/31/18	★★
D-1348.	ZAK_NY 2089-90	OHSU Dr. Addicott Note 1/31/18	★★
D-1349.	ZAK_NY 2095-97	OHSU Dr. Nesmith Note 2/1/18	★★

D-1350.	ZAK_NY 2097-99	OHSU Brief Vascular and IR Progress Note 2/1/18	★★
D-1351.	ZAK_NY 2132-33	OHSU CT abdomen 1/31/18	★★
D-1352.	CD OHSU Radiology	Accompanying 1/31/18 film	★★
D-1353.	ZAK_NY 2289	OHSU Telephone Encounter 1/30/18 RN	★★
D-1354.	ZAK_NY 2489-96	OHSU Dr. Levander Note 1/13/18	★★
D-1355.	ZAK_NY 2496-2502	OHSU Discharge Summary 1/16/18	★★
D-1356.	ZAK_NY 2519-21	OHSU Dr. Ando & Dr. Collins Notes 1/14/18	★★
D-1357.	ZAK_NY 2532-37	OHSU Dr. Khalsa Note 1/15/18	★★
D-1358.	ZAK_NY 2537	OHSU Dr. Mayo Note 1/16/18	★★
D-1359.	ZAK_NY 2716	OHSU Dr. Cetnar Note 1/12/18	★★
D-1360.	ZAK_NY 2889-90	OHSU LCSW Macuiba Note 12/27/17	★★
D-1361.	ZAK_NY 2944-55	OHSU ED Provider Notes 12/16/17	★★
D-1362.	ZAK_NY 2993-94	OHSU CT abdomen and pelvis 12/16/17	★★
D-1363.	CD OHSU Radiology	Accompanying 12/16/17 film	★★
D-1364.	ZAK_NY 3034-35	OHSU Telephone Encounter 12/16/17	★★
D-1365.	ZAK_NY 3043-45	OHSU Dr. Mayo Note 12/15/17	★★
D-1366.	ZAK_NY 3048-49	OHSU Dr. Mayo Note 12/14/17	★★
D-1367.	ZAK_NY 3072-73	OHSU CT Multiphase Liver and Pelvis 11/21/17	★★
D-1368.	ZAK_NY 3074-75	OHSU Upper GI Endoscopy 9/1/17	★★
D-1369.	ZAK_NY 3079	OHSU Telephone Encounter 12/13/17	★★
D-1370.	ZAK_NY 3087	OHSU LCSW Macuiba Note 12/12/17	★★
D-1371.	ZAK_NY 3093-98	OHSU Dr. Addicott Note 12/10/17	★★
D-1372.	ZAK_NY 3098-99	OHSU Dr. Addicott Note 12/11/17	★★
D-1373.	ZAK_NY 3105-06	OHSU bilateral biliary catheter checks 12/11/17	★★
D-1374.	ZAK_NY 3179-86	OHSU Dr. Mayo 12/6/17	★★
D-1375.	ZAK_NY 3235-36	OHSU Chemotherapy Nurse Note 12/5/17	★★
D-1376.	ZAK_NY 3268-80	OHSU PA Johnston Note 12/5/17	★★
D-1377.	ZAK_NY 3320-21	OHSU Telephone Encounter & RN Schafer Note 12/5/17	★★
D-1378.	ZAK_NY 3331	OHSU Telephone Encounter 11/30/17	★★

D-1379.	ZAK_NY 3349-51	OHSU Liver protocol CT abdomen, CT pelvis 11/21/17	★★
D-1380.	CD OHSU Radiology	Accompanying 11/21/17 film	★★
D-1381.	ZAK_NY 3388-93	OHSU Dr. Shabrang Note 11/14/17	★★
D-1382.	ZAK_NY 3394-95	OHSU Dr. Shabrang Note 11/15/17	★★
D-1383.	ZAK_NY 3396-98	OHSU biliary tube exchange 11/15/17	★★
D-1384.	ZAK_NY 3539-52	OHSU PA Smith Note 11/10/17	★★
D-1385.	ZAK_NY 3568	OHSU CTA Chest	★★
D-1386.	ZAK_NY 3581	OHSU Telephone Encounter 11/9/17	★★
D-1387.	ZAK_NY 3612-13	OHSU CT chest, abdomen and pelvis 11/1/17	★★
D-1388.	CD OHSU Radiology	Accompanying 11/1/17 film	★★
D-1389.	ZAK_NY 3629	OHSU Message 10/31/17	★★
D-1390.	ZAK_NY 3630	OHSU Message 10/29/17	★★
D-1391.	ZAK_NY 3642-43	OHSU Messages re Thyroid Medication 10/25/17 - 10/26/17	★★
D-1392.	ZAK_NY 3663-64	OHSU Chemotherapy Nurse Note 10/24/17	★★
D-1393.	ZAK_NY 3680-89	OHSU Dr. Lopez Note 10/24/17	★★
D-1394.	ZAK_NY 3722	OHSU Telephone Encounter 10/20/17	★★
D-1395.	ZAK_NY 3729-34	OHSU Dr. Pasko & Dr. Mayo Notes 10/18/17	★★
D-1396.	ZAK_NY 3805	OHSU Message 10/6/17	★★
D-1397.	ZAK_NY 3855-56	OHSU Chemotherapy Nurse Note 10/3/17	★★
D-1398.	ZAK_NY 3975-80	OHSU Dr. Mayo Note 9/27/17	★★
D-1399.	ZAK_NY 4002-13	OHSU Dr. Lopez Note 9/27/17	★★
D-1400.	ZAK_NY 4064-68	OHSU Dr. West Note 9/20/17	★★
D-1401.	ZAK_NY 4068-69	OHSU Dr. West Note 9/21/17	★★
D-1402.	ZAK_NY 4069-71	OHSU Biliary tube exchange 9/21/17	★★
D-1403.	ZAK_NY 4134	OHSU Telephone Encounter 9/19/17	★★
D-1404.	ZAK_NY 4161-62	OHSU CT chest, abdomen and pelvis 9/18/17	★★
D-1405.	CD OHSU Radiology	Accompanying 9/18/17 film	★★
D-1406.	ZAK_NY 4207-15	OHSU Dr. Strasfeld Note 9/13/17	★★
D-1407.	ZAK_NY 4239-43	OHSU Dr. Mayo Note 9/13/17	★★
D-1408.	ZAK_NY 4301-02	OHSU Telephone Encounter 9/8/17	★★

D-1409.	ZAK_NY 4321-27	OHSU PA Wogu Note 9/6/17	★★
D-1410.	ZAK_NY 4328-33	OHSU Dr. Mayo Note 9/7/17	★★
D-1411.	ZAK_NY 4334-37	OHSU Dr. Mayo Note 9/8/17	★★
D-1412.	ZAK_NY 4366-70	OHSU Dr. Camos Note 9/5/17	★★
D-1413.	ZAK_NY 4371-72	OHSU Dr. Shabrang Note 9/5/17	★★
D-1414.	ZAK_NY 4383-84	OHSU Brief Vascular and IR Progress Note 9/8/17	★★
D-1415.	ZAK_NY 4458-59	OHSU External biliary drainage catheter placement 9/5/17	★★
D-1416.	ZAK_NY 4460-61	OHSU Fluoroscopically guided biliary tube check and exchange 9/5/17	★★
D-1417.	ZAK_NY 4630-36	OHSU ED Provider Notes 9/1/17	★★
D-1418.	ZAK_NY 4646-51	OHSU Dr. Mayo Note 9/1/17	★★
D-1419.	ZAK_NY 4667-68	OHSU Liver protocol CT of the abdomen, CT pelvis 9/1/17	★★
D-1420.	CD OHSU Radiology	Accompanying 9/1/17 film	★★
D-1421.	ZAK_NY 4693-95	OHSU CT abdomen and pelvis 9/1/17	★★
D-1422.	CD OHSU Radiology	Accompanying 9/1/17 film	★★
D-1423.	ZAK_NY 4710	OHSU Dr. Bakis Note 9/1/17	★★
D-1424.	ZAK_NY 4753	OHSU Dr. Blanke Note 8/31/17	★★
D-1425.	ZAK_NY 4775-84	OHSU Dr. Lopez Note 8/30/17	★★
D-1426.	ZAK_NY 4807-12	OHSU Dr. Mayo Note 8/30/17	★★
D-1427.	ZAK_NY 4868	OHSU Telephone Encounter 8/24/17	★★
D-1428.	ZAK_NY 4890-97	OHSU Dr. Pasko & Dr. Mayo Notes 8/23/17	★★
D-1429.	ZAK_NY 4949-53	OHSU Dr. Pasko Note 8/17/17	★★
D-1430.	ZAK_NY 4953-56	OHSU Discharge Summary 8/20/17	★★
D-1431.	ZAK_NY 4991-93	OHSU conversion external to internal-external drain 8/18/17	★★
D-1432.	ZAK_NY 5100-03	OHSU CT chest, abdomen and pelvis 8/17/17	★★
D-1433.	CD OHSU Radiology	Accompanying 8/17/17 film	★★
D-1434.	ZAK_NY 5128-30	OHSU Dr. Pasko Note 8/16/17	★★
D-1435.	ZAK_NY 5270-71	OHSU PET scan 8/7/17	★★
D-1436.	ZAK_NY 5305-11	OHSU Dr. Mayo Note 8/2/17	★★
D-1437.	ZAK_NY 5383-88	OHSU Dr. Mayo Note 7/28/17	★★
D-1438.	ZAK_NY 5388-95	OHSU Discharge Summary 7/29/17	★★
D-1439.	ZAK_NY 5404-10	OHSU ID Note 7/29/17	★★



D-1440.	ZAK_NY 5434	OHSU Focused US LLQ abdominal wall 7/27/17	★★
D-1441.	CD OHSU Radiology	Accompanying 7/27/17 film	★★
D-1442.	ZAK_NY 5435-38	OHSU Liver protocol CT of the abdomen, CT pelvis 7/27/17	★★
D-1443.	CD OHSU Radiology	Accompanying 7/27/17 film	★★
D-1444.	ZAK_NY 5439-40	OHSU US-Guided Aspiration 7/28/17	★★
D-1445.	CD OHSU Radiology	Accompanying 7/28/17 film	★★
D-1446.	ZAK_NY 5534-41	OHSU Dr. Mayo Note 7/26/17	★★
D-1447.	ZAK_NY 5581-90	OHSU Dr. Lopez Note 7/25/17	★★
D-1448.	ZAK_NY 5627-28	OHSU Brief Operative Note 7/24/17	★★
D-1449.	ZAK_NY 5635-36	OHSU Surgical Pathology 7/24/17 Procedure	★★
D-1450.	ZAK_NY 5835-41	OHSU Dr. Strasfeld Note 7/11/17	★★
D-1451.	ZAK_NY 5876-83	OHSU ED Provider Notes 7/4/17	★★
D-1452.	ZAK_NY 5902-05	OHSU Discharge Summary 7/7/17	★★
D-1453.	ZAK_NY 5905-10	OHSU Dr. Wieck Note 7/4/17	★★
D-1454.	ZAK_NY 5910-16	OHSU Dr. Thompson Note 7/5/17	★★
D-1455.	ZAK_NY 5938	OHSU Dr. Addicott Note 7/4/17	★★
D-1456.	ZAK_NY 5938-42	OHSU Dr. Vetto Note 7/4/17	★★
D-1457.	ZAK_NY 5942-47	OHSU Dr. Addicott Note 7/4/17	★★
D-1458.	ZAK_NY 5947-48	OHSU Post Procedure Note 7/4/17	★★
D-1459.	ZAK_NY 5949-50	OHSU Dr. Vetto Note 7/5/17	★★
D-1460.	ZAK_NY 5950-54	OHSU Dr. Walker Note 7/5/17	★★
D-1461.	ZAK_NY 5954-59	OHSU Dr. Maki Note 7/5/17	★★
D-1462.	ZAK_NY 5959-60	OHSU Dr. Maki Note 7/6/17	★★
D-1463.	ZAK_NY 5960-64	OHSU Dr. Miller Note 7/6/17	★★
D-1464.	ZAK_NY 5964-67	OHSU Dr. Walker Note 7/7/17	★★
D-1465.	ZAK_NY 5967-68	OHSU Dr. Vetto Note 7/7/17	★★
D-1466.	ZAK_NY 5968-71	OHSU Dr. Hum Note 7/7/17	★★
D-1467.	ZAK_NY 6027-28	OHSU CT abdomen and pelvis 7/4/17	★★
D-1468.	CD OHSU Radiology	Accompanying 7/4/17 film	★★
D-1469.	ZAK_NY 6029-31	OHSU Visceral angiogram with embolization 7/4/17	★★
D-1470.	CD OHSU Radiology	Accompanying 7/4/17 film	★★
D-1471.	ZAK_NY 6031-33	OHSU Drainage catheter exchange 7/6/17	★★
D-1472.	ZAK_NY 6187-89	OHSU American Medical Response 7/4/17	★★

D-1473.	ZAK_NY 6194-95	OHSU Patient Informed Consent 7/4/17	★★
D-1474.	ZAK_NY 6210-12	OHSU Liver Conference Report 6/27/17	★★
D-1475.	ZAK_NY 6221-22	OHSU MDTB Recommendations 6/27/17	★★
D-1476.	ZAK_NY 6227-33	OHSU PA Milanese Note 6/27/17	★★
D-1477.	ZAK_NY 6258-59	OHSU Liver protocol CT of the abdomen, CT pelvis 6/26/17	★★
D-1478.	CD OHSU Radiology	Accompanying 6/26/17 film	★★
D-1479.	ZAK_NY 6297	OHSU RN Maccini Note 6/22/17	★★
D-1480.	ZAK_NY 6318-21	OHSU Microsatellite Instability Analysis 6/27/17	★★
D-1481.	ZAK_NY 6332-33	OHSU Chemotherapy Nurse Note 6/21/17	★★
D-1482.	ZAK_NY 6349-57	OHSU Dr. Lopez Note 6/21/17	★★
D-1483.	ZAK_NY 6391-98	OHSU Amended Solid Tumor Panel Report 6/19/17	★★
D-1484.	ZAK_NY 6398-6401	OHSU Solid Tumor Panel Report 6/29/17	★★
D-1485.	ZAK_NY 6408-11	OHSU Dr. Strasfeld Note 6/15/17	★★
D-1486.	ZAK_NY 6484-92	OHSU Dr. Strasfeld Note 6/14/17	★★
D-1487.	ZAK_NY 6524-25	OHSU Dr. Strasfeld Note 6/13/17	★★
D-1488.	ZAK_NY 6527-29	OHSU Abdomen MRI/MRCP 6/12/17	★★
D-1489.	CD OHSU Radiology	Accompanying 6/12/17 film	★★
D-1490.	ZAK_NY 6540-41	OHSU CT Chest 6/12/17	★★
D-1491.	ZAK_NY 6589-90	OHSU Dr. Strasfeld Note 6/8/17	★★
D-1492.	ZAK_NY 6594-95	OHSU Dr. Strasfeld Note 6/8/17	★★
D-1493.	ZAK_NY 6635-37	OHSU Dr. Strasfeld Note 6/7/17	★★
D-1494.	ZAK_NY 6644-45	OHSU Chemotherapy Nurse Note 6/7/17	★★
D-1495.	ZAK_NY 6655-61	OHSU Dr. Mayo Note 6/7/17	★★
D-1496.	ZAK_NY 6704-13	OHSU Dr. Strasfeld Note 6/6/17	★★
D-1497.	ZAK_NY 6741-42	OHSU Abscessogram 6/6/17	★★
D-1498.	ZAK_NY 6919-20	OHSU Messages re Hepatic drain 5/16/17	★★
D-1499.	ZAK_NY 6924-26	OHSU Dr. Mayo Note 5/16/17	★★
D-1500.	ZAK_NY 6945-53	OHSU Dr. Mayo Note 5/10/17	★★
D-1501.	ZAK_NY 10129-34	OHSU Dr. Jedrzejewski Note 2/16/18	★★
D-1502.	ZAK_NY 10134-39	OHSU Discharge Summary 2/23/18	★★

D-1503.	ZAK_NY 10139-51	OHSU Dr. Salberg Note 2/17/18	★★
D-1504.	ZAK_NY 10158-62	OHSU Dr. Fontana Note 2/21/18	★★
D-1505.	ZAK_NY 10162-64	OHSU Dr. Maier Note 2/22/18	★★
D-1506.	ZAK_NY 10178-83	OHSU Dr. Shabrang Note 2/16/18	★★
D-1507.	ZAK_NY 10187-88	OHSU Dr. Shabrang Note 2/17/18	★★
D-1508.	ZAK_NY 10192-94	OHSU Dr. Shabrang Note 2/18/18	★★
D-1509.	ZAK_NY 10287-88	OHSU US Abdomen 2/22/18	★★
D-1510.	CD OHSU Radiology	Accompanying 2/22/18 film	★★
D-1511.	ZAK_NY 10452-60	OHSU ED Provider Nnotes 5/16/17	★★
D-1512.	ZAK_NY 10472-77	OHSU Dr. Mayo Note 5/16/17	★★
D-1513.	ZAK_NY 10478-82	OHSU Dr. Mayo Note 6/5/17	★★
D-1514.	ZAK_NY 10488-96	OHSU Dr. Nyendak Note 5/18/17	★★
D-1515.	ZAK_NY 10496-10501	OHSU Dr. Stucky Note 5/19/17	★★
D-1516.	ZAK_NY 10510-16	OHSU Dr. Stucky Note 5/22/17	★★
D-1517.	ZAK_NY 10516-21	OHSU Dr. Stucky Note 5/23/17	★★
D-1518.	ZAK_NY 10542-48	OHSU Dr. Stucky Note 5/29/17	★★
D-1519.	ZAK_NY 10548-55	OHSU Dr. Salberg Note 5/30/17	★★
D-1520.	ZAK_NY 10556-63	OHSU Dr. Salberg Note 5/31/17	★★
D-1521.	ZAK_NY 10564-70	OHSU Dr. Salberg Note 6/1/17	★★
D-1522.	ZAK_NY 10636-37	OHSU CSWA Wauters Note 5/31/17	★★
D-1523.	ZAK_NY 10642-44	OHSU Dr. Mayo Note 5/23/17	★★
D-1524.	ZAK_NY 10644-45	OHSU PICC Line Insertion Procedure Note 6/1/17	★★
D-1525.	ZAK_NY 10646-49	OHSU Dr. Mayo Note 5/17/17	★★
D-1526.	ZAK_NY 10674-79	OHSU Dr. Mayo Note 5/22/17	★★
D-1527.	ZAK_NY 10679-83	OHSU Dr. Mayo Note 5/23/17	★★
D-1528.	ZAK_NY 10688-92	OHSU Dr. Mayo Note 5/25/17	★★
D-1529.	ZAK_NY 10692-96	OHSU Dr. Mayo Note 5/26/17	★★
D-1530.	ZAK_NY 10696-10700	OHSU Dr. Pothier Note 5/27/17	★★
D-1531.	ZAK_NY 10700-04	OHSU Dr. Pothier Note 5/28/17	★★
D-1532.	ZAK_NY 10704-08	OHSU Dr. Pothier Note 5/29/17	★★
D-1533.	ZAK_NY 10708-13	OHSU Dr. Mayo Note 5/31/17	★★
D-1534.	ZAK_NY 10713-17	OHSU Dr. Harrison Note 5/30/17	★★
D-1535.	ZAK_NY 10719-23	OHSU Dr. Mayo Note 5/31/17	★★
D-1536.	ZAK_NY 10724-28	OHSU Dr. Mayo Note 6/1/17	★★
D-1537.	ZAK_NY 10729-33	OHSU Dr. Mayo Note 6/2/17	★★
D-1538.	ZAK_NY 11119-20	OHSU CT abdomen and pelvis 5/17/17	★★
D-1539.	CD OHSU Radiology	Accompanying 5/17/17 film	★★

D-1540.	ZAK_NY 11122-23	OHSU Abscess drain exchange 5/17/17	★★
D-1541.	CD OHSU Radiology	Accompanying 5/17/17 film	★★
D-1542.	ZAK_NY 11125	OHSU 5/18/17 Abdomen MRI	★★
D-1543.	CD OHSU Radiology	Accompanying 5/18/17 film	★★
D-1544.	ZAK_NY 11127-28	OHSU Liver protocol CT of abdomen. CT of pelvis 5/21/17	★★
D-1545.	CD OHSU Radiology	Accompanying 5/21/17 film	★★
D-1546.	ZAK_NY 11130-31	OHSU US Liver 5/27/17	★★
D-1547.	CD OHSU Radiology	Accompanying 5/27/17 film	★★
D-1548.	ZAK_NY 11133-34	OHSU CT abdomen and pelvis 5/28/17	★★
D-1549.	CD OHSU Radiology	Accompanying 5/28/17 film	★★
D-1550.	ZAK_NY 11135-36	OHSU US abdomen 5/30/17	★★
D-1551.	CD OHSU Radiology	Accompanying 5/30/17 film	★★
D-1552.	ZAK_NY 11136-37	OHSU Percutaneous drainage of intrahepatic biloma 5/31/17	★★
D-1553.	CD OHSU Radiology	Accompanying 5/31/17 film	★★
D-1554.	ZAK_NY 15714	CC Call Note 12/13/17	★★
D-1555.	ZAK_NY 15715-19	CC Dr. Menon Note 12/18/17	★★
D-1556.	ZAK_NY 15724	CC Call Note 12/18/17	★★
D-1557.	ZAK_NY 15728-31	CC Pre-Transplant Pharmacotherapy Evaluation 12/18/17	★★
D-1558.	ZAK_NY 15732-38	CC History & Physical Exam 12/19/17	★★
D-1559.	ZAK_NY 15742-49	CC Psychosocial Evaluation 12/19/17	★★
D-1560.	ZAK_NY 15750-51	CC Dr. Aucejo Note 12/19/17	★★
D-1561.	ZAK_NY 15758-61	CC PET/CT 12/20/17	★★
D-1562.	CD CC Radiology	Accompanying 12/20/17 film	★★
D-1563.	ZAK_NY 15771-79	CC ID Liver PreTransplant Evaluation 12/20/17	★★
D-1564.	ZAK_NY 15789-92	CC Initial Consult Anesthesia 12/20/17	★★
D-1565.	ZAK_NY 15803-04	CC Pre-op Teaching 12/20/17	★★
D-1566.	ZAK_NY 15806-09	CC Medical Oncology Consult 12/21/17	★★
D-1567.	ZAK_NY 15811	CC RN Glending Note 12/21/17	★★
D-1568.	ZAK_NY 15813	CC D. Metz Note 1/9/18	★★
D-1569.	ZAK_NY 15815	CC RN Glending Note 12/22/17	★★
D-1570.	ZAK_NY 15819	CC RN Luciano Note 1/12/18	★★

D-1571.	ZAK_NY 15821	CC V. Best Note 1/18/18	★★
D-1572.	ZAK_NY 15824-26	CC CT Chest 1/25/18	★★
D-1573.	ZAK_NY 15831-33	CC MRI Liver 1/25/18	★★
D-1574.	CD CC Radiology	Accompanying 1/25/18 film	★★
D-1575.	ZAK_NY 15835	CC Call Note 2/2/18	★★
D-1576.	ZAK_NY 15837-38	CC J. Conkey Note 2/6/18	★★
D-1577.	ZAK_NY 15878-79	CC Interpretation of 3/24/16 & 4/10/17 Pathology	★★
D-1578.	ZAK_NY 15893-94	CC Informed Consent Immunotherapy	★★
D-1579.	ZAK_NY 15944-47	CC Procedural Sedation Record 9/28/18	★★
D-1580.	ZAK_NY 16095-16115	CC Anesthesia Record 8/22/19	★★
D-1581.	ZAK_NY 16116-17	CC Informed Consent Transplant	★★
D-1582.	ZAK_NY 16123	CC Call Note 6/14/18	★★
D-1583.	ZAK_NY 16125-26	CC Call Note 5/11/18	★★
D-1584.	ZAK_NY 16127	CC H. Block Note 5/14/18	★★
D-1585.	ZAK_NY 16129	CC Call Note 5/14/15	★★
D-1586.	ZAK_NY 16131	CC Call Note 5/15/18	★★
D-1587.	ZAK_NY 16133	CC Call Note 5/16/18	★★
D-1588.	ZAK_NY 16139	CC Call Note 5/18/18 11:26 AM	★★
D-1589.	ZAK_NY 16141	CC Call Note 5/18/18 12:20 PM	★★
D-1590.	ZAK_NY 16143	CC Call Note 5/30/18 2:27 PM	★★
D-1591.	ZAK_NY 16145	CC Call Note 5/30/18 2:30 PM	★★
D-1592.	ZAK_NY 16160-62	CC Dr. Pelley Note 6/8/18	★★
D-1593.	ZAK_NY 16203-05	CC LCSW Clay Note 6/7/18 - <b>redacting</b> "is said to have seen her story on CNN "my insurance was denying my transplant" and	★★
D-1594.	ZAK_NY 16213	CC Dr. Aucejo Note 6/11/18	★★
D-1595.	ZAK_NY 16217-18	CC MELD Clinic Note 6/11/18	★★
D-1596.	ZAK_NY 16223-26	CC Dr. Menon Note 6/12/18	★★
D-1597.	ZAK_NY 16235	CC RN Short Note 6/12/18	★★
D-1598.	ZAK_NY 16237	CC Cholangiogram 6/12/18	★★
D-1599.	ZAK_NY 16266	CC Call Note 6/12/18	★★
D-1600.	ZAK_NY 16268	CC Call Note 6/15/18	★★
D-1601.	ZAK_NY 16270	CC Call Notes 6/21/18 & 7/3/18	★★
D-1602.	ZAK_NY 16272	CC Call Note 6/21/18	★★
D-1603.	ZAK_NY 16282-85	CC PET/MR 6/27/18	★★
D-1604.	CD CC Radiology	Accompanying 6/27/18 film	★★
D-1605.	ZAK_NY 16301-08	CC Dr. Mawhorter Note 6/28/18	★★

D-1606.	ZAK_NY 16316	CC Call Note 6/28/18	★★
D-1607.	ZAK_NY 16338	CC Call Note 7/3/18	★★
D-1608.	ZAK_NY 16344	CC Call Note 7/9/18	★★
D-1609.	ZAK_NY 16351	CC Call Note 7/13/18	★★
D-1610.	ZAK_NY 16371-73	CC Dr. Pelley Note 7/19/18	★★
D-1611.	ZAK_NY 16418	CC Call Note 7/25/18	★★
D-1612.	ZAK_NY 16424	CC Call Note 7/27/18	★★
D-1613.	ZAK_NY 16475	CC Dr. Martin Note 8/1/18	★★
D-1614.	ZAK_NY 16521-22	CC US Abdomen RUQ 8/1/18	★★
D-1615.	CD CC Radiology	Accompanying 8/1/18 film	★★
D-1616.	ZAK_NY 16652-53	CC Message 7/31/18	★★
D-1617.	ZAK_NY 16654	CC Call Note 7/31/18	★★
D-1618.	ZAK_NY 16693-97	CC Dr. Mawhorter Note 8/15/18	★★
D-1619.	ZAK_NY 16702-05	CC Dr. Menon Note 8/17/18	★★
D-1620.	ZAK_NY 16709	CC Call Note 8/17/18	★★
D-1621.	ZAK_NY 16715	CC Call Note 8/21/18	★★
D-1622.	ZAK_NY 16717-18	CC Call Notes 8/21/18 - 8/22/18	★★
D-1623.	ZAK_NY 16722	CC Call Note 8/24/18	★★
D-1624.	ZAK_NY 16746-47	Call Notes 8/28/18	★★
D-1625.	ZAK_NY 16749	CC Call Note 8/29/18 9:07 AM	★★
D-1626.	ZAK_NY 16751	CC Call Note 8/29/18 9:13 AM	★★
D-1627.	ZAK_NY 16753-55	CC Dr. Pelley Note 8/31/18	★★
D-1628.	ZAK_NY 16774	CC Call Note 9/10/18	★★
D-1629.	ZAK_NY 16781	CC Call Note 9/17/18	★★
D-1630.	ZAK_NY 16783-86	CC Dr. Menon Note 9/18/18	★★
D-1631.	ZAK_NY 16799-800	CC RN Englert Note 9/21/18	★★
D-1632.	ZAK_NY 16842-47	CC PET/CT 9/25/18	★★
D-1633.	CD CC Radiology	Accompanying 9/25/18 film	★★
D-1634.	ZAK_NY 16850	CC Call Note 9/26/18 10:23 AM	★★
D-1635.	ZAK_NY 16852	CC Call Note 9/26/18 10:30 AM	★★
D-1636.	ZAK_NY 16858	CC Call Notes 9/26/18 - 9/27/18	★★
D-1637.	ZAK_NY 16926	CC Dr. Martin Note 9/27/18	★★
D-1638.	ZAK_NY 16926-27	CC Dr. Mehta Note 9/28/18	★★
D-1639.	ZAK_NY 17162	CC Call Notes 9/28/18 1:40 PM, 2:48 PM	★★
D-1640.	ZAK_NY 17164	CC Call Note 9/28/18 2:27 PM	★★
D-1641.	ZAK_NY 17170-71	CC CT Chest 10/4/18	★★
D-1642.	ZAK_NY 17180	CC Call Note 10/5/18	★★
D-1643.	ZAK_NY 17218	CC Call Note 10/16/18	★★

D-1644.	ZAK_NY 17222	CC NP Nelson Note 10/17/18	★★
D-1645.	ZAK_NY 17235	CC Dr. Martin Note 10/19/18	★★
D-1646.	ZAK_NY 17276	CC Brief Procedure Note 10/25/18	★★
D-1647.	ZAK_NY 17291-92	CC MRI Chest Wall/Rib 10/26/18	★★
D-1648.	ZAK_NY 17386	CC Call Notes 10/25/18 9:31 AM, 12:23 PM	★★
D-1649.	ZAK_NY 17388	CC Call Note 10/25/18 9:57 AM	★★
D-1650.	ZAK_NY 17393	CC Call Note 10/25/18 12:37 PM	★★
D-1651.	ZAK_NY 17395	CC Call Note 10/26/18	★★
D-1652.	ZAK_NY 17397	CC Call Note 10/29/18 11:32 AM	★★
D-1653.	ZAK_NY 17399	CC Call Note 10/29/18 9:22 PM	★★
D-1654.	ZAK_NY 17407	CC Call Note 10/31/18 3:24 PM	★★
D-1655.	ZAK_NY 17411-13	CC Dr. Pelley Note 11/2/18	★★
D-1656.	ZAK_NY 17450-51	CC Dr. Incledon Note 11/6/18	★★
D-1657.	ZAK_NY 17453-56	CC Dr. Menon Note 11/6/18	★★
D-1658.	ZAK_NY 17460	CC Call Note 11/7/18 10:19 AM	★★
D-1659.	ZAK_NY 17468	CC Dr. Aucejo Note 11/8/18	★★
D-1660.	ZAK_NY 17473	CC Call Note 11/8/18	★★
D-1661.	ZAK_NY 17477	CC Call Note 11/14/18	★★
D-1662.	ZAK_NY 17479	CC Call Note 11/19/18	★★
D-1663.	ZAK_NY 17481-87	CC Dr. Murthy Note 11/21/18	★★
D-1664.	ZAK_NY 17497	CC Call Note 11/21/18	★★
D-1665.	ZAK_NY 17501-02	CC PA Taweel Note 11/23/18	★★
D-1666.	ZAK_NY 17529	CC Call Note 11/23/18	★★
D-1667.	ZAK_NY 17541	CC Call Note 11/30/18	★★
D-1668.	ZAK_NY 17548-51	CC PET/CT 12/3/18	★★
D-1669.	ZAK_NY 17558-61	CC CT abdomen and pelvis 12/5/18	★★
D-1670.	CD CC Radiology	Accompanying 12/5/18 film	★★
D-1671.	ZAK_NY 17564	CC Call Note 12/6/18	★★
D-1672.	ZAK_NY 17566	CC Call Note 12/7/18	★★
D-1673.	ZAK_NY 17643-45	CC CT Abdomen and Pelvis 12/24/18	★★
D-1674.	CD CC Radiology	Accompanying 12/14/18 film	★★
D-1675.	ZAK_NY 17763	CC Call Note 1/3/19	★★
D-1676.	ZAK_NY 17768-70	CC Dr. Pelley Note 1/4/19	★★
D-1677.	ZAK_NY 17827-31	CC Dr. Menon Note 1/16/19	★★
D-1678.	ZAK_NY 17837	CC RN English Note 1/16/19	★★
D-1679.	ZAK_NY 17841	CC NP Sullinger Note 1/17/19	★★
D-1680.	ZAK_NY 17855	CC Brief Procedure Note 1/18/19	★★



D-1681.	ZAK_NY 17892	CC Call Note 1/24/19	★★
D-1682.	ZAK_NY 17897	CC NP Cotrell Note 1/25/19	★★
D-1683.	ZAK_NY 17921-23	CC Dr. Estfan Note 1/25/19	★★
D-1684.	ZAK_NY 17968-70	CC PA Pinkava Note 2/15/19	★★
D-1685.	ZAK_NY 17994	CC Call Note 2/20/19	★★
D-1686.	ZAK_NY 17995	CC Call Note 2/23/19 & 3/7/19	★★
D-1687.	ZAK_NY 18008	CC Call Note 2/28/19	★★
D-1688.	ZAK_NY 18012-16	CC Dr. Menon Note 3/1/19	★★
D-1689.	ZAK_NY 18031-33	CC Dr. Estfan Note 3/8/19	★★
D-1690.	ZAK_NY 18070	CC Call Note 3/14/19	★★
D-1691.	ZAK_NY 18086-92	CC NP Oliver Note 3/26/19	★★
D-1692.	ZAK_NY 18109-12	CC PA Pinkava Note 4/4/19	★★
D-1693.	ZAK_NY 18137-38	CC NP Sullinger Note 4/3/19	★★
D-1694.	ZAK_NY 18158	CC Brief Procedure Note 4/4/19	★★
D-1695.	ZAK_NY 18192	CC Call Note 4/5/19	★★
D-1696.	ZAK_NY 18217-22	CC Dr. Menon Note 4/30/19	★★
D-1697.	ZAK_NY 18232	CC Dr. Martin Note 4/17/19	★★
D-1698.	ZAK_NY 18274	CC Call Note 4/22/19	★★
D-1699.	ZAK_NY 18278	CC Brief Procedure Note 4/23/19	★★
D-1700.	ZAK_NY 18329-31	CC NP O'Brien Note 4/26/19	★★
D-1701.	ZAK_NY 18366	CC Message 5/8/19	★★
D-1702.	ZAK_NY 18376-80	CC PET/CT 5/16/19	★★
D-1703.	CD CC Radiology	Accompanying 5/16/19 film	★★
D-1704.	ZAK_NY 18383	CC Call Note 5/16/19 5:18 PM	★★
D-1705.	ZAK_NY 18386	CC Call Note 5/16/19 8:28 AM	★★
D-1706.	ZAK_NY 18397-99	CC PA Pinkava Note 5/19/19	★★
D-1707.	ZAK_NY 18434-36	CC CT Liver/Pelvis 5/20/19	★★
D-1708.	CD CC Radiology	Accompanying 5/20/19 film	★★
D-1709.	ZAK_NY 18441	CC Call Note 5/21/19	★★
D-1710.	ZAK_NY 18446	CC LISW Humberson Note 5/28/19	★★
D-1711.	ZAK_NY 18448	CC Call Note 5/22/19	★★
D-1712.	ZAK_NY 18450	CC Call Note 5/23/19	★★
D-1713.	ZAK_NY 18459	CC Brief Procedure Note 5/24/19	★★
D-1714.	ZAK_NY 18494	CC Call Notes 5/24/19 - 5/26/19	★★
D-1715.	ZAK_NY 18499	CC Dr. Chauhan Note 5/28/19	★★
D-1716.	ZAK_NY 18517	CC Call Note 5/30/19	★★
D-1717.	ZAK_NY 18519-20	CC Call Notes 5/30/19 - 5/31/19	★★
D-1718.	ZAK_NY 18535	CC Call Note 6/3/19	★★
D-1719.	ZAK_NY 18537	CC Call Note 6/3/19	★★



D-1720.	ZAK_NY 18541-42	CC CT Neck 6/4/19	★★
D-1721.	ZAK_NY 18545	CC Call Note 6/4/19	★★
D-1722.	ZAK_NY 18555-56	CC Fine Needle Aspiration 6/6/19	★★
D-1723.	ZAK_NY 18572	CC Call Note 6/7/19	★★
D-1724.	ZAK_NY 18577	CC Call Note 6/8/19	★★
D-1725.	ZAK_NY 18579	CC Call Note 6/10/19	★★
D-1726.	ZAK_NY 18538-85	CC Dr. Harris Note 6/10/19	★★
D-1727.	ZAK_NY 18597	CC Call Note 6/20/19	★★
D-1728.	ZAK_NY 18612	CC Call Note 6/24/19	★★
D-1729.	ZAK_NY 18614	CC Call Note 6/26/19	★★
D-1730.	ZAK_NY 18616-21	CC Dr. Menon Note 7/10/19	★★
D-1731.	ZAK_NY 18631-33	CC Dr. Estfan Note 7/8/19	★★
D-1732.	ZAK_NY 18641	CC Call Note 7/1/19	★★
D-1733.	ZAK_NY 18644	CC Call Note 7/5/19	★★
D-1734.	ZAK_NY 18658	CC Call Note 7/11/19	★★
D-1735.	ZAK_NY 18660	CC Call Note 7/12/19	★★
D-1736.	ZAK_NY 18662	CC Call Note 7/16/19	★★
D-1737.	ZAK_NY 18685	CC Call Note 7/23/19	★★
D-1738.	ZAK_NY 18687-97	CC Dr. Menon Note 7/25/19	★★
D-1739.	ZAK_NY 18710	CC Call Note 7/25/19	★★
D-1740.	ZAK_NY 18716	CC Call Note 7/29/19	★★
D-1741.	ZAK_NY 18753-64	CC Dr. Lindenmeyer Note 7/30/19	★★
D-1742.	ZAK_NY 19074	CC Call Note 8/2/19	★★
D-1743.	ZAK_NY 19079	CC Call Note 8/5/19	★★
D-1744.	ZAK_NY 19081-82	CC Order 8/6/19	★★
D-1745.	ZAK_NY 19087-88	CC Call Note 8/7/19	★★
D-1746.	ZAK_NY 19094	CC Call Note 8/19/19	★★
D-1747.	ZAK_NY 19096	CC Call Note 8/20/19 9:54 AM	★★
D-1748.	ZAK_NY 19098	CC Call Note 8/20/19 12:11 PM	★★
D-1749.	ZAK_NY 19100	CC Call Note 8/20/19 5:57 PM	★★
D-1750.	ZAK_NY 19102-07	CC Dr. Menon Note 8/22/19	★★
D-1751.	ZAK_NY 19115-16	CC Chest X-Ray 8/22/19	★★
D-1752.	ZAK_NY 19122	CC Expiration Summary 8/23/19	★★
D-1753.	ZAK_NY 19124-29	CC History & Physical 8/22/19	★★
D-1754.	ZAK_NY 19132	CC RN Buck Note 8/22/19	★★
D-1755.	ZAK_NY 19136-39	CC Dr. Hashimoto Operative Report 8/22/19	★★
D-1756.	ZAK_NY 19139-42	CC Dr. Aucejo Operative Report 8/22/19	★★

D-1757.	ZAK_NY 19143	CC Post Anesthesia Evaluation Note 8/23/19	★★
D-1758.	ZAK_NY 19144-45	CC Brief Op Note 8/23/19	★★
D-1759.	ZAK_NY 19145-68	CC Surgery Summary 8/22/19	★★
D-1760.	ZAK_NY 19277	CC Call Note 8/22/19	★★
D-1761.	ZAK_NY 19281	CC Call Note 8/22/19	★★
D-1762.	ZAK_NY 19319-22	CC Surgical Pathology 8/22/19 Procedure	★★
D-1763.	ZAK_NY 19326-29	CC Allogene Laboratories Report 9/3/19	★★
D-1764.	ZAK_NY 19360-61	CC CT Volume Measurements 5/10/19	★★
D-1765.	CD CC Radiology	Accompanying 5/10/19 films	★★
D-1766.	CV of Dr. Goldberg	reserving right depending on if Court allows CV of plaintiff's experts	★★
D-1767.	Rule 1006 summary of cancer treatment, hospitalizations, surgeries, procedures with supporting documents referencing the medical record		The parties have agreed to exchange evidentiary summaries on March 7, 2023. Plaintiff reserves his objections.
D-1768.	Rule 1006 summary of lab values with supporting documents referencing the medical record		The parties have agreed to exchange evidentiary summaries on March 7, 2023. Plaintiff reserves his objections.

### Defendants' Proposed List of Demonstratives

<u>Ex. No.</u>	<u>Title</u>	<u>Objections</u>
DD-1	Dr. Israel's Expert Report	FRE 801/802 report is inadmissible hearsay. Further, Dr. Israel was precluded by Order of this Court. (Doc. 409). The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves further objections.
DD-2	Dr. Sadler's Hepatic Arterial Image #1 7/30/14 study	The parties have agreed to exchange demonstratives on

		March 7, 2023. Plaintiff reserves his objections.
DD-3	Dr. Sadler's Hepatic Arterial Image #2 7/30/14 study	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-4	Dr. Sadler's Hepatic Arterial Image #3 1/24/17 study	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-5	Anatomic diagrams of liver and treatment of the liver, including HAI pump, surgeries, ablations, embolization, and transplant	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-6	Video animation of liver anatomy and lesions	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-7	Illustration of sink effect	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-8	NeuWave illustration of Multi-Probe Synchrony	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-9	Radiographic images with measurements of distances from lesion to vessels and structures within the liver	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-10	Radiographic images with measurements of post-ablation zone	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-11	Radiographic images with references to liver interventions/treatments during course of Ms. Zak's medical care	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-12	Charts and graphs of various lab values	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.
DD-13	Timelines of relevant events in Ms. Zak's medical care and treatment	The parties have agreed to exchange demonstratives on March 7, 2023. Plaintiff reserves his objections.

**(k) Admissions, interrogatory answers or other written discovery responses the parties intend to offer into evidence, together with any objections to these materials;**

**Plaintiff:**

Request	No.	Defendants' objection
Defendants' Response to Plaintiff's First Set of Interrogatories:		
	1	Irrelevant, misleading, waste of time and prejudicial.
	2	Irrelevant, misleading, waste of time and prejudicial. Defendants' interrogatory was palpably improper and outside the scope of SDNY Local Rule 33.3.
	11	Irrelevant, misleading, waste of time and prejudicial. Defendants' interrogatory was palpably improper and outside the scope of SDNY Local Rule 33.3. Also sought information protected from disclosure by New York's medical peer review/quality assurance review privilege.
	15	Irrelevant, misleading, waste of time and prejudicial given subsequent amendment.
Defendants' Amended Response to Plaintiff's First Set of Interrogatories:		
	15	Irrelevant, misleading, waste of time and prejudicial given subsequent amendment.
Defendants' Second Supplemental Response to Plaintiff's First Set of Interrogatories:		
	15	Cumulative and waste of time as information contained in witness testimony Improper use of impeachment evidence

Defendants' Response to Plaintiff's Admissions:		
	37	Irrelevant, misleading, waste of time and prejudicial
	38	Irrelevant, misleading, waste of time and prejudicial
	39	Cumulative and waste of time as information contained in witness testimony
	40	Waste of time as information contained in witness testimony Misleading and prejudicial
	41	Waste of time as information contained in witness testimony Misleading and prejudicial
	42	Waste of time as information contained in witness testimony Misleading and prejudicial
	43	Waste of time as information contained in witness testimony Misleading and prejudicial
	44	Waste of time as information contained in witness testimony Misleading and prejudicial
	45	Waste of time as information contained in witness testimony and stipulated to
	54	Waste of time as information contained in witness testimony Misleading and prejudicial
	55	Waste of time as information contained in witness testimony Misleading and prejudicial

**(l) List of in limine motions**

The Court ruled on the parties motions in limine. See Doc. 407 (Plaintiff's motions) and Doc. 409 (Defendants' motions).

**Plaintiff's Motions in Limine:**

1. Motion in Limine Number 1, exclude any mention of collateral sources of payment;
2. Motion in Limine Number 2, exclude the expert testimony of Dr. Skye Mayo;
3. Motion in Limine Number 3, exclude the testimony of Mr. Schefelker;
4. Motion in Limine Number 4, exclude any mention of Scott Powers's dating relationship after the death of his wife;

5. Motion in Limine Number 5, exclude evidence or argument regarding: (1) Memorial Sloan Kettering Cancer Center (MSK)'s character or reputation in the community, (2) any potential adverse effect this suit may have on MSK, their doctors, or the community, and (3) Dr. Sofocleous's character or reputation, and (4) any "apology" or expressions of sympathy by the Defendants;
6. Motion in Limine Number 6, exclude evidence and/or argument pertaining to a prior ablation procedure; and
7. Motion in Limine Number 7, admitting Erika Zak's article posthumously published in the Washington Post.

**Defendants' Motions in limine:**

- No. 1** – to preclude NeuWave information and claims of spoliation (Docs. 289-290);
- No. 2** – to preclude Plaintiff's four "rebuttal" experts (Docs. 291-292);
- No. 3** – to preclude Dr. DeMatteo's testimony outside his expertise (Docs. 293-294);
- No. 4** – to preclude Dr. DeMatteo's non-disclosed expert testimony that is also without a factual basis (Docs. 295-296);
- No. 5** – to preclude Plaintiff's cumulative expert testimony (Docs. 297-298);
- No. 6** – to preclude Plaintiff's expert economist (Docs. 299-300);
- No. 7** – to preclude claims against Dr. Kemeny (Docs. 301-302);
- No. 8** – to preclude cured of cancer language (Docs. 303-304);
- No. 9** – to preclude claim regarding multidisciplinary tumor board (Docs. 305-306);
- No. 10** – to preclude alleged subsequent change in policies (Docs. 307-308);
- No. 11** – to preclude UNOS hearsay record (Docs. 309-310);
- No. 12** – to preclude ranking care on scale of 1-10 (Docs. 311-312);
- No. 13** – to preclude cumulative and hearsay damages evidence (Docs. 313-314);
- No. 14** – to preclude Memorial provided counsel to Dr. DeMatteo (Docs. 315-316);
- No. 15** – to preclude irrelevant evidence (Docs. 317-318);
- No. 16** – to preclude Dr. Goldberg's deposition testimony (Doc. 319); and
- No. 17** – to preclude certain treating physician testimony (Doc. 320-321).

**(m) Stipulations of uncontested facts**

1. Erika Zak died on August 23, 2019.
2. Scott Powers is the personal representative of the Estate of Erika Zak.
3. Scott Powers is the legal and natural guardian of L.P.
4. L.P. is the biological daughter of Erika Zak and Scott Powers.
5. L.P. was born on [REDACTED], 2014.
6. Scott Powers and Erika Zak were married from October 31, 2009 until the day of her death, August 23, 2009.
7. Scott Powers and L.P. are the surviving distributees of the Estate of Erika Zak.
8. Dr. Constantinos Sofocleous is an employee of Memorial Sloan Kettering Cancer Center.
9. See the parties arguments below regarding Local Rule 56.1 Statements

**Defendants' argument**

Defendants contend that there are numerous uncontested facts as set forth in the Local Rule 56.1 Statement (Doc. 235-1). A motion for summary judgment is the equivalent of a trial on paper, and plaintiff did not contest numerous of facts as part of dispositive motion practice. Plaintiff objects and advised Defendants to file a letter with the Court to address same, and Defendants will do so.

**Plaintiff's response**

Plaintiff objects to this list being included here as "stipulations." Defendants conflate the 56.1 statement response with stipulations. The purpose of the 56.1 statement is to have facts "deemed to be admitted for purposes of the motion." SDNY Local Rule 56.1(c) (emphasis added). Those facts were admitted for the limited purpose of Defendants pending summary judgment motion. They are not uncontested for the purposes of trial. A stipulation is, by its definition, an agreement of the parties. Plaintiff has never agreed to stipulate to these facts. Plaintiff objects to Defendants attempt to include these statements as "stipulations," when no such stipulation has ever been proposed, agreed to, or recorded.

**(n) A statement of each element of damages and, except for intangible damages (e.g., pain and suffering, mental anguish or loss of consortium), the dollar amount, including prejudgment interest, punitive damages and attorneys' fees;**

Element of Tangible Damages	Amount	Pre-judgment interest
Medical Expenses	\$1,471,577.03	No.
Loss of Earnings/ Impairment of Earning Ability From Injury to Death	\$170,000	No.
Funeral Expenses	\$5,263.92	Yes.
Voluntary Assistance (Loss of the portion of Erika's earnings that she would have spent for the care and support of Scott and L.P.)	\$5,356,844.50	Yes.
Possible Inheritance by Decedents (The amount Erika would have increased her estate from her earnings and thus added to the amount that would have been inherited from her.)	\$2,295,790.50	Yes.
Loss of Household Services (The services Erika would have performed for her spouse and children in the care and management of the family home.)	\$2,160,000.00	Yes.
Services Superintending the Household and Services Training the Child (Derivative action of Scott Powers.)	\$175,000	No.

**(o) Other requested relief;**

**Plaintiff:**

In addition to the tangible damages outlined above, Plaintiff requests damages for Erika's pain and suffering, including physical disfigurement, from the moment of physical injury to the moment of death including Erika's reduced capacity to lead a normal life, loss of enjoyment of life, physical pain, and emotional pain, (including shock and fright); Scott Power's loss of consortium; and the loss of nurture and guidance (the intellectual, moral and physical guidance and assistance Erika would have given L.P. had Erika lived).

**Defendants' Objections:**

Defendants object to Plaintiff improperly seeking pre-judgment interest on certain categories of damages marked by "\*\*\*" above. Pre-judgment interest only runs on pecuniary damages for wrongful death. Defendants also object to Plaintiff seeking certain damages in the preceding paragraph, including "shock and fright."

**(p) A statement whether the parties consent to less than a unanimous verdict.**

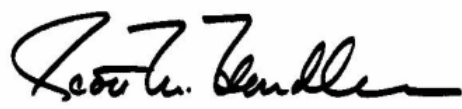
The parties were unable to reach agreement to consent to less than a unanimous verdict.

Dated: February 28, 2023

Respectfully submitted,

HENDLER FLORES LAW, PLLC

By: \_\_\_\_\_



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**ATTORNEYS FOR PLAINTIFF**



KAUFMAN BORGEEST & RYAN LLP

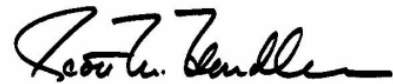
/s/ Betsy D. Baydala

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**CERTIFICATE OF SERVICE**

I hereby certify that, on February 28, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record for Defendants.



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Scott M. Hendler